

CAUSE NO. DC-21-07664

ALVARO ALVARADO and MARIA DEL  
ROSARIO TOBIAS § IN THE DISTRICT COURT

Plaintiff, §

VS. § 160<sup>TH</sup> JUDICIAL DISTRICT

AVENTIS INC., ET AL. §

Defendants. §

DALLAS COUNTY, TEXAS

**EXHIBIT B**  
**STATE COURT DOCUMENTS**

Pleadings 1

## Case Information

DC-21-07664 | ALVARO ALVARADO, et al vs. AVENTIS INC., et al

Case Number	Court	Judicial Officer
DC-21-07664	160th District Court	REDMOND, AIESHA
File Date	Case Type	Case Status
06/16/2021	OTHER (CIVIL)	OPEN

## Party

PLAINTIFF  
ALVARADO, ALVARO

Address  
5625 PARKDALE  
DALLAS TX 75227

Active Attorneys ▾  
Lead Attorney  
MONTEMAYOR, JENNIFER  
Retained

PLAINTIFF  
LLANES, MARIA

Aliases  
AKA DEL ROSARIO TOBIAS, MARIA  
Address  
5625 PARKDALE  
DALLAS TX 75227

Active Attorneys ▾  
Lead Attorney  
MONTEMAYOR, JENNIFER  
Retained

DEFENDANT  
AVENTIS INC.,

Address  
THROUGH SECRETARY OF STATE  
2595 INTERSTATE DRIVE, SUITE 103  
HARRISBURG PA 17110

Case 3:21-cv-01850-S Document 1-2 Filed 08/09/21 Page 3 of 183 PageID 17  
DEFENDANT  
BARRETT'S MINERALS INC.

Address  
ITS REGISTERED AGENT, CT CORPORATION SYSTEM  
1999 BRYAN STREET, SUITE 900  
DALLAS TX 75201-3140

---

DEFENDANT  
BAYER CONSUMER CARE HOLDINGS LLC

Aliases  
*FKA* BAYER CONSUMER CARE LLC  
*FKA* MSD CONSUMER CARE, INC  
Address  
THROUGH SECRETARY OF STATE  
251 LITTLE FALLS DRIVE  
WILMINGTON DE 19808

---

DEFENDANT  
BAYER HEALTHCARE LLC  
Address  
ITS REGISTERED AGENT, CORPORATION SERVICE COMPANY  
211 E. 7TH STREET, SUITE 620  
AUSTIN TX 78701-3218

---

DEFENDANT  
BRENNTAG NORTH AMERICA, INC.  
Address  
THROUGH SECRETARY OF STATE  
1209 ORANGE STREET  
WILMINGTON DE 19801

---

DEFENDANT  
BRENNTAG SPECIALTIES, LLC  
Aliases  
*FKA* BRENNTAG SPECIALTIES, INC.  
*FKA* MINERAL PIGMENT SOLUTIONS, INC.  
Address  
ITS REGISTERED AGENT, CT CORPORATION SYSTEM  
1999 BRYAN STREET, SUITE 900  
DALLAS TX 75201-3140

---

CLINIQUE LABORATORIES, INC.

Address

THROUGH SECRETARY OF STATE  
80 STATE STREET  
ALBANY NY 12207

---

DEFENDANT

CLINIQUE LABORATORIES, LLC

Address

THROUGH SECRETARY OF STATE  
251 LITTLE FALLS DRIVE  
WILMINGTON DE 19808

---

DEFENDANT

COLOR TECHNIQUES, INC.

Address

THROUGH SECRETARY OF STATE  
1202 LAUREL OAK ROAD, SUITE 205  
VOORHIES NJ 08043

---

DEFENDANT

COSMETIC SPECIALTIES, INC.

Aliases

DBA G&G SPECIALTY PRODUCTS CO

Address

THROUGH SECRETARY OF STATE  
125 WHITE HORSE PIKE  
HADDON HEIGHTS NJ 08035

---

DEFENDANT

CROWN LABORATORIES, INC.

Address

THROUGH SECRETARY OF STATE  
251 LITTLE FALLS DRIVE  
WILMINGTON DE 19808

---

DEFENDANT

DR. SCHOLL'S LLC

Address

---

DEFENDANT  
ESTEE LAUDER, INC.

Address  
THROUGH SECRETARY OF THE STATE  
251 LITTLE FALLS DRIVE  
WILMINGTON DE 19808

---

DEFENDANT  
THE ESTE LAUDER COMPANIES, INC.

Address  
THROUGH SECRETARY OF THE STATE  
251 LITTLE FALLS DRIVE  
WILMINGTON DE 19808

---

DEFENDANT  
FIESTA MART, L.L.C.

Address  
ITS REGISTERED AGENT, CT CORPORATION SYSTEM  
1999 BRYAN STREET, SUITE 900  
DALLAS TX 75201-3140

---

DEFENDANT  
FISONS CORPORATION

Address  
THROUGH SECRETARY OF STATE  
84 STATE STREET  
BOSTON ME 02109

---

DEFENDANT  
GSK CONSUMER HEALTH, INC.

Aliases  
FKA NOVARTIS CONSUMER HEALTH INC.  
FKA CIBA SELF-MEDICATION, INC.

Address  
THROUGH SECRETARY OF STATE  
251 LITLLE FALLS DRIVE  
WILMINGTON DE 19808

---

DEFENDANT  
L'OREAL USA, INC.

Address  
THROUGH SECRETARY OF STATE  
251 LITLLE FALLS DRIVE  
WILMINGTON DE 19808

---

DEFENDANT  
MAYBELLINE LLC

Address  
THROUGH SECRETARY OF STATE  
80 STATE STREET  
ALBANY NY 12207

---

DEFENDANT  
MERCK & CO., INC.

Address  
ITS REGISTERED AGENT, CT CORPORATION SYSTEM  
1999 BRYAN STREET, SUITE 900  
DALLAS TX 75201

---

DEFENDANT  
NOVARTIS CORPORATION

Address  
THROUGH SECRETARY OF STATE  
80 STATE STREET  
ALBANY NY 12207

---

DEFENDANT  
PFIZER INC.

Address  
ITS REGISTERED AGENT, CT CORPORATION SYSTEM  
1999 BRYAN STREET, SUITE 900  
DALLAS TX 75201

---

DEFENDANT  
PRESPERSE CORPORATION

Address

THROUGH SECRETARY OF STATE  
1209 ORANGE STREET  
WILMINGTON DE 19801

---

DEFENDANT  
PRESPERSE INTERNATIONAL CORP

Address  
THROUGH SECRETARY OF STATE  
820 BEAR TAVERN ROAD  
W. TRENTON NJ 08628

---

DEFENDANT  
PTI UNION, LLC

Aliases  
AKA PHARMA TECH INDUSTRIES,  
Address  
THROUGH SECRETARY OF STATE  
1209 ORANGE STREET  
WILMINGTON DE 19801

---

DEFENDANT  
REVLON CONSUMER PRODUCTS CORPORATION

Address  
THROUGH SECRETARY OF STATE  
3411 SILVERSIDE ROAD, TATNALL BUILDING, SUITE 104  
WILMINGTON DE 19810

---

DEFENDANT  
SANOFI-AVENTIS U.S. LLC

Address  
THROUGH SECRETARY OF STATE  
251 LITTLE FALLS DRIVE  
WILMINGTON DE 19808

---

DEFENDANT  
SCHOLL'S WELLNESS COMPANY LLC,

Address  
THROUGH SECRETARY OF STATE  
1209 ORANGE STREET  
WILMINGTON DE 19801

DEFENDANT

SPECIALTY MINERALS INC.

Address

ITS REGISTERED AGENT, CT CORPORATION SYSTEM  
1999 BRYAN STREET, SUITE 900  
DALLAS TX 75201

---

DEFENDANT

WHITTAKER CLARK & DANIELS, INC.

Address

THROUGH SECRETARY OF STATE  
3 BECKER FARM ROAD, 4TH FLOOR  
ROSELAND NJ 07068

## Events and Hearings

06/16/2021 NEW CASE FILED (OCA) - CIVIL

06/16/2021 CASE FILING COVER SHEET ▾

COVER SHEET

06/16/2021 ORIGINAL PETITION ▾

ORIGINAL PETITION

06/16/2021 CORRESPONDENCE - LETTER TO FILE ▾

CORRESPONDENCE - REQUEST FOR CITATIONS

06/16/2021 JURY DEMAND ▾

JURY DEMAND FORM

06/16/2021 ISSUE CITATION COMM OF INS OR SOS ▾

ISSUE CITATION COMM OF INS OR SOS - AVENTIS INC

ISSUE CITATION COMM OF INS OR SOS - BAYER CONSUMER CARE HOLDINGS LLC

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ISSUE CITATION COMM OF INS OR SOS - CLINIQUE LABORATORIES, INC

ISSUE CITATION COMM OF INS OR SOS - CLINIQUE LABORATORIES, LLC

ISSUE CITATION COMM OF INS OR SOS - COLOR TECHNIQUES, INC.

ISSUE CITATION COMM OF INS OR SOS - COSMETIC SPECIALTIES, INC.

ISSUE CITATION COMM OF INS OR SOS - CROWN LABORATORIES, INC

ISSUE CITATION COMM OF INS OR SOS - DR. SCHOLL'S LLC

ISSUE CITATION COMM OF INS OR SOS - ESTEE LAUDER, INC

ISSUE CITATION COMM OF INS OR SOS - THE ESTEE LAUDER COMPANIES, INC.

ISSUE CITATION COMM OF INS OR SOS - FISONS CORPORATION

ISSUE CITATION COMM OF INS OR SOS - GSK CONSUMER HEALTH, INC

ISSUE CITATION COMM OF INS OR SOS - L'OREAL USA, INC.

ISSUE CITATION COMM OF INS OR SOS - MAYBELLINE LLC

ISSUE CITATION COMM OF INS OR SOS - NOVARTIS CORPORATION

ISSUE CITATION COMM OF INS OR SOS - PRESPERSE CORPORATION

ISSUE CITATION COMM OF INS OR SOS - PRESPERSE INTERNATIONAL CORP

ISSUE CITATION COMM OF INS OR SOS - PTI UNION, LLC A/K/A PHARMA TECH INDUSTRIES

ISSUE CITATION COMM OF INS OR SOS - REVOLN CONSUMER PRODUCTS CORPORATION

ISSUE CITATION COMM OF INS OR SOS - SANOFI-AVENTIS U.S. LLC

ISSUE CITATION COMM OF INS OR SOS - SCHOLL S WELLNESS COMPANY LLC

ISSUE CITATION COMM OF INS OR SOS - WHITTAKER CLARK & DANIELS, INC

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**06/16/2021 ISSUE CITATION ▾**

ISSUE CITATION - BARRETT'S MINERALS INC

ISSUE CITATION - BAYER HEALTHCARE LLC

ISSUE CITATION - BRENNTAG SPECIALTIES, LLC

ISSUE CITATION - FIESTA MART, L.L.C.

ISSUE CITATION - MERCK & CO., INC.

ISSUE CITATION - PFIZER INC

ISSUE CITATION - SPECIALTY MINERALS INC

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**06/18/2021 CITATION SOS/COI/COH/HAG ▾**

Served

07/14/2021

Anticipated Server

ESERVE

Anticipated Method

Actual Server

OUT OF COUNTY

Returned

07/19/2021

Comment

AVENTIS INC

06/18/2021 CITATION SOS/COI/COH/HAG ▾

Served

07/14/2021

Anticipated Server

ESERVE

Anticipated Method

Actual Server

OUT OF COUNTY

Returned

07/19/2021

Comment

BAYER CONSUMER CARE HOLDINGS LLC

06/18/2021 CITATION SOS/COI/COH/HAG ▾

Served

07/14/2021

Anticipated Server

ESERVE

Anticipated Method

Actual Server

OUT OF COUNTY

Returned

07/19/2021

Comment

BRENNETAG NORTH AMERICA, INC.

06/18/2021 CITATION SOS/COI/COH/HAG ▾

Served

07/14/2021

Anticipated Server

ESERVE

Anticipated Method

Actual Server

OUT OF COUNTY

Returned

07/19/2021

Comment

CLINIQUE LABORATORIES, INC

06/18/2021 CITATION SOS/COI/COH/HAG ▾

Served  
07/14/2021

Anticipated Server  
**ESERVE**

Anticipated Method

Actual Server

**OUT OF COUNTY**

Returned

07/19/2021

Comment

**CLINIQUE LABORATORIES, LLC**

06/18/2021 CITATION SOS/COI/COH/HAG ▾

Served  
07/14/2021

Anticipated Server  
**ESERVE**

Anticipated Method

Actual Server

**OUT OF COUNTY**

Returned

07/19/2021

Comment

**COLOR TECHNIQUES, INC.**

06/18/2021 CITATION SOS/COI/COH/HAG ▾

Served  
07/14/2021

Anticipated Server  
**ESERVE**

Anticipated Method

Actual Server

**OUT OF COUNTY**

Returned

07/19/2021

Comment

**COSMETIC SPECIALTIES, INC.**

06/18/2021 CITATION SOS/COI/COH/HAG ▾

Served  
07/14/2021

Anticipated Server  
**ESERVE**

Anticipated Method

Actual Server

**OUT OF COUNTY**

Returned

07/19/2021

Comment

CROWN LABORATORIES, INC

06/18/2021 CITATION SOS/COI/COH/HAG ▾

Served

07/14/2021

Anticipated Server

**ESERVE**

Anticipated Method

Actual Server

**OUT OF COUNTY**

Returned

07/19/2021

Comment

DR. SCHOLL'S LLC

06/18/2021 CITATION SOS/COI/COH/HAG ▾

Served

07/14/2021

Anticipated Server

**ESERVE**

Anticipated Method

Actual Server

**OUT OF COUNTY**

Returned

07/19/2021

Comment

ESTEE LAUDER, INC

06/18/2021 CITATION SOS/COI/COH/HAG ▾

Served

07/14/2021

Anticipated Server

**ESERVE**

Anticipated Method

Actual Server

**OUT OF COUNTY**

Returned

07/19/2021

Comment

THE ESTEE LAUDER COMPANIES, INC.

06/18/2021 CITATION SOS/COI/COH/HAG ▾

Served  
07/14/2021

Anticipated Server  
**ESERVE**

Anticipated Method  
Actual Server  
**OUT OF COUNTY**

Returned  
07/19/2021  
Comment  
**FISONS CORPORATION**

06/18/2021 CITATION SOS/COI/COH/HAG ▾

Served  
07/14/2021

Anticipated Server  
**ESERVE**

Anticipated Method  
Actual Server  
**OUT OF COUNTY**

Returned  
07/19/2021  
Comment  
**GSK CONSUMER HEALTH, INC**

06/18/2021 CITATION SOS/COI/COH/HAG ▾

Served  
07/14/2021

Anticipated Server  
**ESERVE**

Anticipated Method  
Actual Server  
**OUT OF COUNTY**

Returned  
07/19/2021  
Comment  
**L'OREAL USA, INC.**

06/18/2021 CITATION SOS/COI/COH/HAG ▾

Served  
07/14/2021

Anticipated Server  
**ESERVE**

Anticipated Method

Actual Server

**OUT OF COUNTY**

Returned

07/19/2021

Comment

MAYBELLINE LLC

06/18/2021 CITATION SOS/COI/COH/HAG ▾

Served

07/14/2021

Anticipated Server

**ESERVE**

Anticipated Method

Actual Server

**OUT OF COUNTY**

Returned

07/19/2021

Comment

NOVARTIS CORPORATION

06/18/2021 CITATION SOS/COI/COH/HAG ▾

Served

07/14/2021

Anticipated Server

**ESERVE**

Anticipated Method

Actual Server

**OUT OF COUNTY**

Returned

07/19/2021

Comment

PRESPERSE CORPORATION

06/18/2021 CITATION SOS/COI/COH/HAG ▾

Served

07/14/2021

Anticipated Server

**ESERVE**

Anticipated Method

Actual Server

**OUT OF COUNTY**

Returned

07/19/2021

Comment

PRESPERSE INTERNATIONAL CORP

06/18/2021 CITATION SOS/COI/COH/HAG ▾

Served

07/14/2021

Anticipated Server

ESERVE

Anticipated Method

Actual Server

OUT OF COUNTY

Returned

07/19/2021

Comment

PTI UNION, LLC A/K/A PHARMA TECH INDUSTRIES

06/18/2021 CITATION SOS/COI/COH/HAG ▾

Served

07/14/2021

Anticipated Server

ESERVE

Anticipated Method

Actual Server

OUT OF COUNTY

Returned

07/19/2021

Comment

REVLON CONSUMER PRODUCTS CORPORATION

06/18/2021 CITATION SOS/COI/COH/HAG ▾

Served

07/14/2021

Anticipated Server

ESERVE

Anticipated Method

Actual Server

OUT OF COUNTY

Returned

07/19/2021

Comment

SANOFI-AVENTIS U.S. LLC

06/18/2021 CITATION SOS/COI/COH/HAG ▾

Served

07/14/2021

Anticipated Server

ESERVE

Anticipated Method

Actual Server

**OUT OF COUNTY**

Returned

07/19/2021

Comment

SCHOLL'S WELLNESS COMPANY LLC

06/18/2021 CITATION SOS/COI/COH/HAG ▾

Served

07/14/2021

Anticipated Server

**ESERVE**

Anticipated Method

Actual Server

**OUT OF COUNTY**

Returned

07/19/2021

Comment

WHITTAKER CLARK & DANIELS, INC

06/18/2021 CITATION ▾

Served

07/13/2021

Anticipated Server

**ESERVE**

Anticipated Method

Actual Server

**PRIVATE PROCESS SERVER**

Returned

07/19/2021

Comment

BARRETT'S MINERALS INC

06/18/2021 CITATION ▾

Served

07/14/2021

Anticipated Server

**ESERVE**

Anticipated Method

Actual Server

**OUT OF COUNTY**

Returned

07/19/2021

Comment

BAYER HEALTHCARE LLC

06/18/2021 CITATION ▾

Served  
07/13/2021

Anticipated Server  
**ESERVE**

Anticipated Method  
Actual Server  
**PRIVATE PROCESS SERVER**

Returned  
07/19/2021  
Comment  
**BRENNETAG SPECIALTIES, LLC**

06/18/2021 CITATION ▾

Served  
07/13/2021

Anticipated Server  
**ESERVE**

Anticipated Method  
Actual Server  
**PRIVATE PROCESS SERVER**

Returned  
07/19/2021  
Comment  
**FIESTA MART, L.L.C.**

06/18/2021 CITATION ▾

Served  
07/13/2021

Anticipated Server  
**ESERVE**

Anticipated Method  
Actual Server  
**PRIVATE PROCESS SERVER**

Returned  
07/19/2021  
Comment  
**MERCK & CO., INC.**

06/18/2021 CITATION ▾

Served  
07/13/2021

Anticipated Server  
**ESERVE**

Anticipated Method

Actual Server

**PRIVATE PROCESS SERVER**

Returned

07/19/2021

Comment

**PFIZER INC**

06/18/2021 CITATION ▾

Served

07/13/2021

Anticipated Server

**ESERVE**

Anticipated Method

Actual Server

**PRIVATE PROCESS SERVER**

Returned

07/19/2021

Comment

**SPECIALTY MINERALS INC**

06/29/2021 AMENDED PETITION ▾

PLAINTIFFS' FIRST AMENDED COMPLAINT AND JURY DEMAND

Comment

**FIRST**

07/19/2021 RETURN OF SERVICE ▾

EXECUTED SOS CITATION - AVENTIS INC

Comment

**EXECUTED SOS CITATION - AVENTIS INC**

07/19/2021 RETURN OF SERVICE ▾

EXECUTED SOS CITATION - BAYER CONSUMER CARE HOLDINGS LLC

Comment

**EXECUTED SOS CITATION - BAYER CONSUMER CARE HOLDINGS LLC**

07/19/2021 RETURN OF SERVICE ▾

EXECUTED CITATION - BAYER HEALTHCARE LLC

Comment

**EXECUTED CITATION - BAYER HEALTHCARE LLC**

07/19/2021 RETURN OF SERVICE ▾

EXECUTED SOS CITATION - BRENNETAG NORTH AMERICA, INC.

Comment

EXECUTED SOS CITATION - BRENNTAG NORTH AMERICA, INC.

07/19/2021 RETURN OF SERVICE ▾

EXECUTED SOS CITATION - CLINIQUE LABORATORIES, INC.

Comment

EXECUTED SOS CITATION - CLINIQUE LABORATORIES, INC.

07/19/2021 RETURN OF SERVICE ▾

EXECUTED SOS CITATION - CLINIQUE LABORATORIES LLC

Comment

EXECUTED SOS CITATION - CLINIQUE LABORATORIES LLC

07/19/2021 RETURN OF SERVICE ▾

EXECUTED SOS CITATION - COLOR TECHNIQUES, INC.

Comment

EXECUTED SOS CITATION - COLOR TECHNIQUES, INC.

07/19/2021 RETURN OF SERVICE ▾

EXECUTED SOS CITATION - CROWN LABORATORIES, INC

Comment

EXECUTED SOS CITATION - CROWN LABORATORIES, INC

07/19/2021 RETURN OF SERVICE ▾

EXECUTED SOS CITATION - COSMETIC SPECIALTIES INC

Comment

EXECUTED SOS CITATION - COSMETIC SPECIALTIES INC

07/19/2021 RETURN OF SERVICE ▾

EXECUTED SOS CITATION - DR SCHOLL'S LLC

Comment

EXECUTED SOS CITATION - DR SCHOLL'S LLC

07/19/2021 RETURN OF SERVICE ▾

EXECUTED SOS CITATION - THE ESTEE LAUDER COMPANIES INC

Comment

EXECUTED SOS CITATION - THE ESTEE LAUDER COMPANIES INC

07/19/2021 RETURN OF SERVICE ▾

EXECUTED SOS CITATION - ESTEE LAUDER INC
Comment EXECUTED SOS CITATION - ESTEE LAUDER INC
07/19/2021 RETURN OF SERVICE ▾
EXECUTED SOS CITATION - FISONS CORPORATION
Comment EXECUTED SOS CITATION - FISONS CORPORATION
07/19/2021 RETURN OF SERVICE ▾
EXECUTED SOS CITATION - GSK CONSUMER HEALTH, INC.
Comment EXECUTED SOS CITATION - GSK CONSUMER HEALTH, INC.
07/19/2021 RETURN OF SERVICE ▾
EXECUTED SOS CITATION - L'OREAL USA INC
Comment EXECUTED SOS CITATION - L'OREAL USA INC
07/19/2021 RETURN OF SERVICE ▾
EXECUTED SOS CITATION - MAYBELLINE LLC
Comment EXECUTED SOS CITATION - MAYBELLINE LLC
07/19/2021 RETURN OF SERVICE ▾
EXECUTED SOS CITATION - NOVARTIS CORPORATION
Comment EXECUTED SOS CITATION - NOVARTIS CORPORATION
07/19/2021 RETURN OF SERVICE ▾
EXECUTED SOS CITATION - PREPERSE INTERNATIONAL CORP
Comment EXECUTED SOS CITATION - PREPERSE INTERNATIONAL CORP
07/19/2021 RETURN OF SERVICE ▾
EXECUTED SOS CITATION - PREPERSE CORPORATION
Comment EXECUTED SOS CITATION - PREPERSE CORPORATION
07/19/2021 RETURN OF SERVICE ▾

Comment EXECUTED SOS CITATION - PTI UNION LLC
07/19/2021 RETURN OF SERVICE ▾
EXECUTED SOS CITATION - REVOL CONSUMER PRODUCTS CORPORATION
Comment EXECUTED SOS CITATION - REVOL CONSUMER PRODUCTS CORPORATION
07/19/2021 RETURN OF SERVICE ▾
EXECUTED SOS CITATION - SANOFI-AVENTIS U.S. LLC
Comment EXECUTED SOS CITATION - SANOFI-AVENTIS U.S. LLC
07/19/2021 RETURN OF SERVICE ▾
EXECUTED CITATION - SCHOLL'S WELLNESS COMPANY LLC
Comment EXECUTED SOS CITATION - SCHOLL'S WELLNESS COMPANY LLC
07/19/2021 RETURN OF SERVICE ▾
EXECUTED CITATION - WHITTAKER CLARK & DANIELS, INC
Comment EXECUTED SOS CITATION - WHITTAKER CLARK & DANIELS, INC
07/19/2021 RETURN OF SERVICE ▾
EXECUTED CITATION - PFIZER INC
Comment EXECUTED CITATION - PFIZER INC
07/19/2021 RETURN OF SERVICE ▾
EXECUTED CITATION - BARRETTS MINERALS INC
Comment EXECUTED CITATION - BARRETTS MINERALS INC
07/19/2021 RETURN OF SERVICE ▾
EXECUTED CITATION - FIESTA MART, L.L.C.
Comment EXECUTED CITATION - FIESTA MART, L.L.C.
07/19/2021 RETURN OF SERVICE ▾

Comment

EXECUTED CITATION - BRENNTAG SPECIALTIES, LLC

07/19/2021 RETURN OF SERVICE ▾

EXECUTED CITATION - MERCK & CO., INC.

Comment

EXECUTED CITATION - MERCK & CO., INC.

07/19/2021 RETURN OF SERVICE ▾

EXECUTED CITATION - SPECIALTY MINERALS INC

Comment

EXECUTED CITATION - SPECIALTY MINERALS INC

08/03/2021 ORIGINAL ANSWER - GENERAL DENIAL ▾

DEFENDANT-ORIGINAL ANSWER

08/24/2021 DISMISSAL FOR WANT OF PROSECUTION ▾

160th Dismissal

Judicial Officer

REDMOND, AIESHA

Hearing Time

3:00 PM

Comment

CASE FILED 6-16-21; DEFS UNSERVED

## Documents

COVER SHEET

ORIGINAL PETITION

CORRESPONDENCE - REQUEST FOR CITATIONS

JURY DEMAND FORM

ISSUE CITATION COMM OF INS OR SOS - AVENTIS INC

**Case 3:21-cv-01850-S Document 1-2 Filed 08/09/21 Page 23 of 183 PageID 37**

ISSUE CITATION COMM OF INS OR SOS - BRENNTAG NORTH AMERICA, INC.  
ISSUE CITATION COMM OF INS OR SOS - CLINIQUE LABORATORIES, INC  
ISSUE CITATION COMM OF INS OR SOS - CLINIQUE LABORATORIES, LLC  
ISSUE CITATION COMM OF INS OR SOS - COLOR TECHNIQUES, INC.  
ISSUE CITATION COMM OF INS OR SOS - COSMETIC SPECIALTIES, INC.  
ISSUE CITATION COMM OF INS OR SOS - CROWN LABORATORIES, INC  
ISSUE CITATION COMM OF INS OR SOS - DR. SCHOLL'S LLC  
ISSUE CITATION COMM OF INS OR SOS - ESTEE LAUDER, INC  
ISSUE CITATION COMM OF INS OR SOS - THE ESTEE LAUDER COMPANIES, INC.  
ISSUE CITATION COMM OF INS OR SOS - FISONS CORPORATION  
ISSUE CITATION COMM OF INS OR SOS - GSK CONSUMER HEALTH, INC  
ISSUE CITATION COMM OF INS OR SOS - L'OREAL USA, INC.  
ISSUE CITATION COMM OF INS OR SOS - MAYBELLINE LLC  
ISSUE CITATION COMM OF INS OR SOS - NOVARTIS CORPORATION  
ISSUE CITATION COMM OF INS OR SOS - PRESPERSE CORPORATION  
ISSUE CITATION COMM OF INS OR SOS - PRESPERSE INTERNATIONAL CORP  
ISSUE CITATION COMM OF INS OR SOS - PTI UNION, LLC A/K/A PHARMA TECH INDUSTRIES  
ISSUE CITATION COMM OF INS OR SOS - REVOLN CONSUMER PRODUCTS CORPORATION  
ISSUE CITATION COMM OF INS OR SOS - SANOFI-AVENTIS U.S. LLC  
ISSUE CITATION COMM OF INS OR SOS - SCHOLL S WELLNESS COMPANY LLC  
ISSUE CITATION COMM OF INS OR SOS - WHITTAKER CLARK & DANIELS, INC  
ISSUE CITATION - BARRETT'S MINERALS INC  
ISSUE CITATION - BAYER HEALTHCARE LLC  
ISSUE CITATION - BRENNTAG SPECIALTIES, LLC  
ISSUE CITATION - FIESTA MART, L.L.C.  
ISSUE CITATION - MERCK & CO., INC.  
ISSUE CITATION - PFIZER INC  
ISSUE CITATION - SPECIALTY MINERALS INC  
PLAINTIFFS' FIRST AMENDED COMPLAINT AND JURY DEMAND  
160th Dismissal  
EXECUTED SOS CITATION - AVENTIS INC  
EXECUTED SOS CITATION - BAYER CONSUMER CARE HOLDINGS LLC  
EXECUTED CITATION - BAYER HEALTHCARE LLC  
EXECUTED SOS CITATION - BRENNTAG NORTH AMERICA, INC.  
EXECUTED SOS CITATION - CLINIQUE LABORATORIES, INC.  
EXECUTED SOS CITATION - CLINIQUE LABORATORIES LLC  
EXECUTED SOS CITATION - COLOR TECHNIQUES, INC.  
EXECUTED SOS CITATION - CROWN LABORATORIES, INC  
EXECUTED SOS CITATION - COSMETIC SPECIALTIES INC  
EXECUTED SOS CITATION - DR SCHOLL'S LLC

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EXECUTED SOS CITATION - ESTEE LAUDER INC  
EXECUTED SOS CITATION - FISONS CORPORATION  
EXECUTED SOS CITATION - GSK CONSUMER HEALTH, INC.  
EXECUTED SOS CITATION - L'OREAL USA INC  
EXECUTED SOS CITATION - MAYBELLINE LLC  
EXECUTED SOS CITATION - NOVARTIS CORPORATION  
EXECUTED SOS CITATION - PREPERSE INTERNATIONAL CORP  
EXECUTED SOS CITATION - PREPERSE CORPORATION  
EXECUTED SOS CITATION - PTI UNION LLC  
EXECUTED SOS CITATION - REVOLN CONSUMER PRODUCTS CORPORATION  
EXECUTED SOS CITATION - SANOFI-AVENTIS U.S. LLC  
EXECUTED CITATION - SCHOLL'S WELLNESS COMPANY LLC  
EXECUTED CITATION - WHITTAKER CLARK & DANIELS, INC  
EXECUTED CITATION - PFIZER INC  
EXECUTED CITATION - BARRETT'S MINERALS INC  
EXECUTED CITATION - FIESTA MART, L.L.C.  
EXECUTED CITATION - BRENNETAG SPECIALTIES, LLC  
EXECUTED CITATION - MERCK & CO., INC.  
EXECUTED CITATION - SPECIALTY MINERALS INC  
DEFENDANT-ORIGINAL ANSWER

**CIVIL CASE INFORMATION SHEET**

DC 21-1064

Case 3:21-cv-01850-S Document 1 Filed 08/09/21 Page 25 of 183 PageID 39

DISTRICT CLERK

DALLAS CO., TEXAS

Alicia Mata DEPUTY

CAUSE NUMBER (FOR CLERK USE ONLY): \_\_\_\_\_ COURT (FOR CLERK USE ONLY): \_\_\_\_\_

ALVARO ALVARADO and MARIA HANES vs, AVENTIS INC., ET AL.

STYLED \_\_\_\_\_

(e.g., John Smith v. All American Insurance Co; In re Mary Ann Jones; In the Matter of the Estate of George Jackson)

A civil case information sheet must be completed and submitted when an original petition or application is filed to initiate a new civil, family law, probate, or mental health case or when a post-judgment petition for modification or motion for enforcement is filed in a family law case. The information should be the best available at the time of filing.

<b>1. Contact information for person completing case information sheet:</b>		<b>Names of parties in case:</b>	<b>Person or entity completing sheet is:</b>
Name: Jennifer I. Montemayor	Email: jmontemayor@sgptrial.com	Plaintiff(s)/Petitioner(s): Alvaro Alvarado Maria Hanes	<input type="checkbox"/> Attorney for Plaintiff/Petitioner <input type="checkbox"/> Pro Se Plaintiff/Petitioner <input type="checkbox"/> Title IV-D Agency <input type="checkbox"/> Other: _____
Address: Simon Greenstone Panatier, PC 1201 Elm Street, Suite 3400	Telephone: 214-276-7680	Defendant(s)/Respondent(s): See attached list	Additional Parties in Child Support Case: Custodial Parent: Non-Custodial Parent: Presumed Father: [Attach additional page as necessary to list all parties]
City/State/Zip: Dallas, TX 75270	Fax: 214-276-7699		
Signature: /s/ Jennifer I. Montemayor	State Bar No: 24098129		

**2. Indicate case type, or identify the most important issue in the case (select only 1):**

<b>Civil</b>			<b>Family Law</b>	
<b>Contract</b>	<b>Injury or Damage</b>	<b>Real Property</b>	<b>Marriage Relationship</b>	<b>Post-Judgment Actions (non-Title IV-D)</b>
<input type="checkbox"/> Debt/Contract <input type="checkbox"/> Consumer/DTPA <input type="checkbox"/> Debt/Contract <input type="checkbox"/> Fraud/Misrepresentation <input type="checkbox"/> Other Debt/Contract:  <input type="checkbox"/> Foreclosure <input type="checkbox"/> Home Equity—Expedited <input type="checkbox"/> Other Foreclosure <input type="checkbox"/> Franchise <input type="checkbox"/> Insurance <input type="checkbox"/> Landlord/Tenant <input type="checkbox"/> Non-Competition <input type="checkbox"/> Partnership <input type="checkbox"/> Other Contract:  <input type="checkbox"/> Employment  <input type="checkbox"/> Tax	<input type="checkbox"/> Assault/Battery <input type="checkbox"/> Construction <input type="checkbox"/> Defamation <b>Malpractice</b> <input type="checkbox"/> Accounting <input type="checkbox"/> Legal <input type="checkbox"/> Medical <input type="checkbox"/> Other Professional Liability:  <input type="checkbox"/> Motor Vehicle Accident <input type="checkbox"/> Premises <b>Product Liability</b> <input type="checkbox"/> Asbestos/Silica <input type="checkbox"/> Other Product Liability List Product:  <input type="checkbox"/> Other Injury or Damage: _____	<input type="checkbox"/> Eminent Domain/ Condemnation <input type="checkbox"/> Partition <input type="checkbox"/> Quiet Title <input type="checkbox"/> Trespass to Try Title <input type="checkbox"/> Other Property: _____	<input type="checkbox"/> Annulment <input type="checkbox"/> Declare Marriage Void <b>Divorce</b> <input type="checkbox"/> With Children <input type="checkbox"/> No Children	<input type="checkbox"/> Enforcement <input type="checkbox"/> Modification—Custody <input type="checkbox"/> Modification—Other  <b>Title IV-D</b> <input type="checkbox"/> Enforcement/Modification <input type="checkbox"/> Paternity <input type="checkbox"/> Reciprocals (UIFSA) <input type="checkbox"/> Support Order
		<b>Related to Criminal Matters</b> <input type="checkbox"/> Expunction <input type="checkbox"/> Judgment Nisi <input type="checkbox"/> Non-Disclosure <input type="checkbox"/> Seizure/Forfeiture <input type="checkbox"/> Writ of Habeas Corpus—Pre-indictment <input type="checkbox"/> Other: _____	<b>Other Family Law</b> <input type="checkbox"/> Enforce Foreign Judgment <input type="checkbox"/> Habeas Corpus <input type="checkbox"/> Name Change <input type="checkbox"/> Protective Order <input type="checkbox"/> Removal of Disabilities of Minority <input type="checkbox"/> Other: _____	<b>Parent-Child Relationship</b> <input type="checkbox"/> Adoption/Adoption with Termination <input type="checkbox"/> Child Protection <input type="checkbox"/> Child Support <input type="checkbox"/> Custody or Visitation <input type="checkbox"/> Gestational Parenting <input type="checkbox"/> Grandparent Access <input type="checkbox"/> Parentage/Paternity <input type="checkbox"/> Termination of Parental Rights <input type="checkbox"/> Other Parent-Child: _____
		<input type="checkbox"/> Administrative Appeal <input type="checkbox"/> Antitrust/Unfair Competition <input type="checkbox"/> Code Violations <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Intellectual Property	<input type="checkbox"/> Lawyer Discipline <input type="checkbox"/> Perpetuate Testimony <input type="checkbox"/> Securities/Stock <input type="checkbox"/> Tortious Interference <input type="checkbox"/> Other: _____	
		<b>Probate &amp; Mental Health</b> <b>Probate/Wills/Intestate Administration</b> <input type="checkbox"/> Dependent Administration <input type="checkbox"/> Independent Administration <input type="checkbox"/> Other Estate Proceedings	<input type="checkbox"/> Guardianship—Adult <input type="checkbox"/> Guardianship—Minor <input type="checkbox"/> Mental Health <input type="checkbox"/> Other: _____	

**3. Indicate procedure or remedy, if applicable (may select more than 1):**

<input type="checkbox"/> Appeal from Municipal or Justice Court <input type="checkbox"/> Arbitration-related <input type="checkbox"/> Attachment <input type="checkbox"/> Bill of Review <input type="checkbox"/> Certiorari <input type="checkbox"/> Class Action	<input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Garnishment <input type="checkbox"/> Interpleader <input type="checkbox"/> License <input type="checkbox"/> Mandamus <input type="checkbox"/> Post-judgment	<input type="checkbox"/> Prejudgment Remedy <input type="checkbox"/> Protective Order <input type="checkbox"/> Receiver <input type="checkbox"/> Sequestration <input type="checkbox"/> Temporary Restraining Order/Injunction <input type="checkbox"/> Turnover
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**4. Indicate damages sought (do not select if it is a family law case):**

- Less than \$100,000, including damages of any kind, penalties, costs, expenses, pre-judgment interest, and attorney fees
- Less than \$100,000 and non-monetary relief
- Over \$100,000 but not more than \$200,000
- Over \$200,000 but not more than \$1,000,000
- Over \$1,000,000

ALVARO ALVARADO and MARIA HANES,

*Plaintiffs,*

vs.

AVENTIS INC. for its Desenex line of products  
Via the Texas Secretary of State  
Corporation Service Company  
2595 Interstate Drive, Suite 103  
Harrisburg, PA 17110

BARRETT'S MINERALS INC.  
CT Corporation System  
1999 Bryan Street, Suite 900  
Dallas, TX 75201-3140

BAYER CONSUMER CARE HOLDINGS LLC f/k/a BAYER CONSUMER CARE LLC f/k/a  
MSD CONSUMER CARE, INC.) for its Dr. Scholl's line of products  
Via the Texas Secretary of State  
Corporation Service Company  
251 Little Falls Drive  
Wilmington, DE 19808

BAYER HEALTHCARE LLC, a subsidiary of BAYER AG, for its Dr. Scholl's line of products  
Corporation Service Company d/b/a Lawyers Incorporating Service Company  
211 E. 7th Street, Suite 620  
Austin, TX 78701-3218

BRENNTAG NORTH AMERICA, INC. (sued individually and as successor-in-interest to  
MINERAL PIGMENT SOLUTIONS, INC. and as successor-in-interest to WHITTAKER  
CLARK & DANIELS, INC.)  
Via the Texas Secretary of State  
The Corporation Trust Company  
Corporation Trust Center  
1209 Orange Street  
Wilmington, DE 19801

BRENNTAG SPECIALTIES, LLC f/k/a BRENNTAG SPECIALTIES, INC. f/k/a MINERAL  
PIGMENT SOLUTIONS, INC. (sued individually and as successor-in-interest to WHITTAKER  
CLARK & DANIELS, INC.)  
CT Corporation System  
1999 Bryan Street, Suite 900  
Dallas, TX 75201-3140

CLINIQUE LABORATORIES, INC., a subsidiary of THE ESTÉÉ LAUDER COMPANIES INC.

Via the Texas Secretary of State  
Corporation Service Company  
80 State Street  
Albany, NY 12207

CLINIQUE LABORATORIES, LLC, a subsidiary of THE ESTÉÉ LAUDER COMPANIES INC.

Via the Texas Secretary of State  
Corporation Service Company  
251 Little Falls Drive  
Wilmington, DE 19808

COLOR TECHNIQUES, INC.

Via the Texas Secretary of State  
Salvatore Giampapa  
1202 Laurel Oak Road, Suite 205  
Voorhies, NJ 08043

COSMETIC SPECIALTIES, INC. (sued individually and formerly d/b/a G&G SPECIALTY PRODUCTS CO.)

Via the Texas Secretary of State  
Ronald W. Grexa  
125 White Horse Pike  
Haddon Heights, NJ 08035

CROWN LABORATORIES, INC. for its Desenex line of products

Via the Texas Secretary of State  
Corporation Service Company  
251 Little Falls Drive  
Wilmington, DE 19808

DR. SCHOLL'S LLC

Via the Texas Secretary of State  
Corporation Service Company  
251 Little Falls Drive  
Wilmington, DE 19808

ESTÉÉ LAUDER, INC., a subsidiary of THE ESTÉÉ LAUDER COMPANIES, INC. for its Clinique line of products

Via the Texas Secretary of State  
The Prentice-Hall Corporation System, Inc.  
251 Little Falls Drive  
Wilmington, DE 19808

THE ESTÉE LAUDER COMPANIES, INC. (sued individually and for Len-Ron Manufacturing Co. Inc.) for its Clinique line of products  
Via the Texas Secretary of State  
The Prentice-Hall Corporation System, Inc.  
251 Little Falls Road  
Wilmington, DE 19808

Fiesta Mart, L.L.C.  
CT Corporation System  
1999 Bryan Street, Suite 900  
Dallas, TX 75201-3140

Fisons Corporation for its Desenex line of products;  
Via the Texas Secretary of State  
Corporation Service Company  
84 State Street  
Boston, MA 02109

GSK CONSUMER HEALTH, INC. f/k/a NOVARTIS CONSUMER HEALTH INC. f/k/a CIBA SELF-MEDICATION, INC. for its Desenex line of products  
Via the Texas Secretary of State  
Corporation Service Company  
251 Little Falls Drive  
Wilmington, DE 19808

L'OREAL USA, INC.  
Via the Texas Secretary of State  
The Prentice-Hall Corporation System  
251 Little Falls Drive  
Wilmington, DE 19808

MAYBELLINE LLC  
Via the Texas Secretary of State  
Corporation Service Company  
80 State Street  
Albany, NY 12207

MERCK & CO., INC. for its Dr. Scholl's line of products  
CT Corporation System  
1999 Bryan Street, Suite 900  
Dallas, TX 75201-3140

NOVARTIS CORPORATION (sued individually and as a successor-in-interest to CIBA-GEIGY CORPORATION and its subsidiaries CIBA CONSUMER PHARMACEUTICALS and CIBA SELF-MEDICATION, INC.) for its Desenex line of products

Via the Texas Secretary of State  
The Prentice Hall Corporation System  
80 State Street  
Albany, NY 12207

PFIZER INC.  
CT Corporation System  
1999 Bryan Street, Suite 900  
Dallas, TX 75201-3140

PRESPERSE CORPORATION  
Via the Texas Secretary of State  
The Corporation Trust Company  
Corporation Trust Center  
1209 Orange Street  
Wilmington, DE 19801

PRESPERSE INTERNATIONAL CORP  
Via the Texas Secretary of State  
CT Corporation System  
820 Bear Tavern Road  
W. Trenton, NJ 08628

PTI UNION, LLC a/k/a PHARMA TECH INDUSTRIES for its Desenex line of products  
Via the Texas Secretary of State  
The Corporation Trust Company  
Corporation Trust Center  
1209 Orange Street  
Wilmington, DE 19801

REVLON CONSUMER PRODUCTS CORPORATION  
Via the Texas Secretary of State  
Corporate Creations Network Inc.  
3411 Silverside Road  
Tatnall Building, Suite 104  
Wilmington, DE 19810

SANOFI-AVENTIS U.S. LLC (sued individually and as successor by merger to AVENTIS PHARMACEUTICALS INC.) for its Desenex line of products  
Via the Texas Secretary of State  
Corporation Service Company  
251 Little Falls Drive  
Wilmington, DE 19808

SCHOLL'S WELLNESS COMPANY LLC for its Dr. Scholl's line of products  
Via the Texas Secretary of State  
The Corporation Trust Company  
Corporation Trust Center  
1209 Orange Street  
Wilmington, DE 19801

SPECIALTY MINERALS INC. (sued individually and as a subsidiary of MINERALS  
TECHNOLOGIES INC.)  
CT Corporation System  
1999 Bryan Street, Suite 900  
Dallas, TX 75201-3140

WHITTAKER CLARK & DANIELS, INC.  
Via the Texas Secretary of State  
Joe Cobuzio  
Tompkins, McGuire, Wacenfeld, et al.  
3 Becker Farm Road, 4th Floor  
Roseland, NJ 07068

DC-21-07664  
CAUSE NO. \_\_\_\_\_

**ALVARO ALVARADO and MARIA  
LLANES,**

*Plaintiffs,*

IN THE DISTRICT COURT

160th

JUDICIAL DISTRICT

vs.

DALLAS COUNTY, TEXAS

**AVENTIS INC.**, for its Desenex line of products;

**BARRETTS MINERALS INC.;**

**AYER CONSUMER CARE HOLDINGS LLC** f/k/a BAYER CONSUMER CARE LLC f/k/a MSD CONSUMER CARE, INC., for its Dr. Scholl's line of products;

**AYER HEALTHCARE LLC**, a subsidiary of BAYER AG, for its Dr. Scholl's line of products;

**BRENNTAG NORTH AMERICA, INC.** (sued individually and as successor-in-interest to MINERAL PIGMENT SOLUTIONS, INC. and as successor-in-interest to WHITTAKER CLARK & DANIELS, INC.);

**BRENNTAG SPECIALTIES, LLC** f/k/a BRENNTAG SPECIALTIES, INC. f/k/a MINERAL PIGMENT SOLUTIONS, INC. (sued individually and as successor-in-interest to WHITTAKER CLARK & DANIELS, INC.);

**CLINIQUE LABORATORIES, INC.**, a subsidiary of THE ESTÉÉ LAUDER COMPANIES INC.;

**CLINIQUE LABORATORIES, LLC**, a subsidiary of THE ESTÉÉ LAUDER COMPANIES INC.;

**COLOR TECHNIQUES, INC.;**

**COSMETIC SPECIALTIES, INC.** (sued individually and formerly d/b/a G&G SPECIALTY PRODUCTS CO.);

**CROWN LABORATORIES, INC.** for its Desenex line of products;

**DR. SCHOLL'S LLC;**

**ESTÉÉ LAUDER, INC.**, a subsidiary of THE ESTÉÉ LAUDER COMPANIES, INC. for its Clinique line of products;

**THE ESTÉÉ LAUDER COMPANIES, INC.**

(sued individually and for Len-Ron Manufacturing Co. Inc.) for its Clinique line of products;

**FIESTA MART, L.L.C.;**

**FISONS CORPORATION**, for its Desenex line of products;

**GSK CONSUMER HEALTH, INC.** f/k/a NOVARTIS CONSUMER HEALTH INC. f/k/a CIBA SELF-MEDICATION, INC., for its Desenex line of products;

**L'OREAL USA, INC.;**

**MAYBELLINE LLC;**

**MERCK & CO., INC.**, for its Dr. Scholl's line of products;

**NOVARTIS CORPORATION** (sued individually and as a successor-in-interest to CIBA-GEIGY CORPORATION and its subsidiaries CIBA CONSUMER PHARMACEUTICALS and CIBA SELF-MEDICATION, INC.), for its Desenex line of products;

**PFIZER INC.;**

**PRESPERSE CORPORATION;**

**PRESPERSE INTERNATIONAL CORP.;**

**PTI UNION, LLC** a/k/a PHARMA TECH INDUSTRIES, for its Desenex line of products;

**REVLON CONSUMER PRODUCTS CORPORATION;**

**SANOFI-AVENTIS U.S. LLC** (sued individually and as successor by merger to AVENTIS PHARMACEUTICALS INC.), for its Desenex line of products;

**SCHOLL'S WELLNESS COMPANY LLC**, for its Dr. Scholl's line of products;

**SPECIALTY MINERALS INC.** (sued individually and as a subsidiary of MINERALS TECHNOLOGIES INC.); and

**WHITTAKER CLARK & DANIELS, INC.;**

*Defendants.*

**PLAINTIFFS' ORIGINAL COMPLAINT AND JURY DEMAND**

**TO THE HONORABLE JUDGE OF SAID COURT:**

COME NOW Plaintiffs, ALVARO ALVARADO and MARIA LLANES, who complain of the various Defendants listed below and for cause of action would show the Court and Jury as follows:

I.

1. Pursuant to T.R.C.P. 190.1, Discovery will be conducted under Level 3 (T.R.C.P. 190.4). Certain Defendants named herein reside in this County, maintain offices in this County and/or have their principal place of business in this County, and/or all or a substantial part of the acts or omissions that form the basis of this lawsuit occurred in this County, therefore, venue properly lies in this County. Certain acts or omissions, which were a proximate or producing cause of Plaintiff ALVARO ALVARADO's asbestos-related injuries, occurred in Texas.

2. The damages Plaintiffs seek are within the jurisdictional limits of this Court. As required by Texas Rule of Civil Procedure 47(c), Plaintiffs state that they seek monetary relief over \$1,000,000.00 for the injuries alleged in this Complaint. Plaintiffs further seek any relief in equity to which they are justly entitled.

3. Plaintiffs ALVARO ALVARADO and MARIA LLANES reside at 5625 Parkdale Drive, Dallas, Texas 75227.

4. Although Defendant **AVENTIS INC.**, for its Desenex line of products, has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said corporation may be served with process at its registered agent in Pennsylvania, Corporation Service Company, 2595 Interstate Drive, Suite 103, Harrisburg, PA 17110. Defendant **AVENTIS INC.**, for its Desenex line of products, may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a manufacturer of asbestos-containing Desenex Foot Powder.

5. Defendant **BARRETT'S MINERALS INC.** may be served through its registered agent for service of process, CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, TX 75201-3140. This Defendant is being sued as a supplier of asbestos-containing talc.

6. Although Defendant **BAYER CONSUMER CARE HOLDINGS LLC** f/k/a **BAYER CONSUMER CARE LLC** f/k/a **MSD CONSUMER CARE, INC.**, for its Dr. Scholl's line of products, has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said limited liability company may be served with process at its registered agent in Delaware, Corporation

Service Company, 251 Little Falls Drive, Wilmington, DE 19808. Defendant **BAYER CONSUMER CARE HOLDINGS LLC** f/k/a BAYER CONSUMER CARE LLC f/k/a MSD CONSUMER CARE, INC., for its Dr. Scholl's line of products, may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a manufacturer of asbestos-containing Dr. Scholl's Foot Powder.

7. Defendant **BAYER HEALTHCARE LLC**, a subsidiary of BAYER AG, for its Dr. Scholl's line of products, may be served through its registered agent for service of process, Corporation Service Company d/b/a Lawyers Incorporating Service Company, 211 E. 7th Street, Suite 620, Austin, TX 78701-3218. This Defendant is being sued as a manufacturer of asbestos-containing Dr. Scholl's Foot Powder.

8. Although Defendant **BRENNTAG NORTH AMERICA, INC.** (sued individually and as successor-in-interest to MINERAL PIGMENT SOLUTIONS, INC. and as successor-in-interest to WHITTAKER CLARK & DANIELS, INC.) has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said corporation may be served with process at its registered agent in Delaware, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. Defendant **BRENNTAG NORTH AMERICA, INC.** (sued individually and as successor-in-interest to MINERAL PIGMENT SOLUTIONS, INC. and as successor-in-interest to WHITTAKER CLARK & DANIELS, INC.) may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a supplier of asbestos-containing talc.

9. Defendant **BRENNTAG SPECIALTIES, LLC** f/k/a BRENNTAG SPECIALTIES, INC. f/k/a MINERAL PIGMENT SOLUTIONS, INC. (sued individually and as successor-in-interest to WHITTAKER CLARK & DANIELS, INC.) may be served through its registered agent for service of process, CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, TX 75201-3140. This Defendant is being sued as a supplier of asbestos-containing talc.

10. Although Defendant **CLINIQUE LABORATORIES, INC.**, a subsidiary of THE ESTÉÉ LAUDER COMPANIES INC., has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said corporation may be served with process at its registered agent in New York, Corporation Service Company, 80 State Street, Albany, NY 12207. Defendant

**CLINIQUE LABORATORIES, INC.**, a subsidiary of THE ESTÉE LAUDER COMPANIES INC., may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a manufacturer of asbestos-containing Clinique Eyeshadows.

11. Although Defendant **CLINIQUE LABORATORIES, LLC**, a subsidiary of THE ESTÉE LAUDER COMPANIES INC., has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said limited liability company may be served with process at its registered agent in Delaware, Corporation Service Company, 251 Little Falls Drive, Wilmington, DE 19808. Defendant **CLINIQUE LABORATORIES, LLC**, a subsidiary of THE ESTÉE LAUDER COMPANIES INC., may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a manufacturer of asbestos-containing Clinique Eyeshadows.

12. Although Defendant **COLOR TECHNIQUES, INC.** has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said corporation may be served with process at its registered agent in New Jersey, Salvatore Giampapa, 1202 Laurel Oak Road, Suite 205, Voorhies, NJ 08043. Defendant **COLOR TECHNIQUES, INC.** may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a supplier of asbestos-containing talc.

13. Although Defendant **COSMETIC SPECIALTIES, INC.** (sued individually and formerly d/b/a G&G SPECIALTY PRODUCTS CO.) for its Dr. Scholl's line of products, has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said corporation may be served with process at its registered agent in New Jersey, Ronald W. Grexa, 125 White Horse Pike, Haddon Heights, NJ 08035. Defendant **COSMETIC SPECIALTIES, INC.** (sued individually and formerly d/b/a G&G SPECIALTY PRODUCTS CO.) for its Dr. Scholl's line of products, may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a supplier of asbestos-containing talc, and as a manufacturer of asbestos-containing Dr. Scholl's Foot Powder.

14. Although Defendant **CROWN LABORATORIES, INC.** for its Desenex line of products, has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore,

said corporation may be served with process at its registered agent in Delaware, Corporation Service Company, 251 Little Falls Drive, Wilmington, DE 19808. Defendant **CROWN LABORATORIES, INC.** for its Desenex line of products, may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a manufacturer of asbestos-containing Desenex Foot Powder.

15. Although Defendant **DR. SCHOLL'S LLC** has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said limited liability company may be served with process at its registered agent in Delaware, Corporation Service Company, 251 Little Falls Drive, Wilmington, DE 19808. Defendant **DR. SCHOLL'S LLC** may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a manufacturer of asbestos-containing Dr. Scholl's Foot Powder.

16. Although Defendant **ESTÉE LAUDER, INC.**, a subsidiary of THE ESTÉE LAUDER COMPANIES, INC. for its Clinique line of products, has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said corporation may be served with process at its registered agent in Delaware, The Prentice-Hall Corporation System, Inc., 251 Little Falls Drive, Wilmington, DE 19808. Defendant **ESTÉE LAUDER, INC.**, a subsidiary of THE ESTÉE LAUDER COMPANIES, INC. for its Clinique line of products, may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a manufacturer of asbestos-containing Clinique Eyeshadows.

17. Although Defendant **THE ESTÉE LAUDER COMPANIES, INC.** (sued individually and for Len-Ron Manufacturing Co. Inc.) for its Clinique line of products, has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said corporation may be served with process at its registered agent in Delaware, The Prentice-Hall Corporation System, Inc., 251 Little Falls Drive, Wilmington, DE 19808. Defendant **THE ESTÉE LAUDER COMPANIES, INC.** (sued individually and for Len-Ron Manufacturing Co. Inc.) for its Clinique line of products, may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a manufacturer of asbestos-containing Clinique Eyeshadows.

18. Defendant **FIESTA MART, L.L.C.** may be served through its registered agent for service of process, CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, TX 75201-3140. This Defendant is being sued as a supplier of asbestos-containing talcum powder and cosmetic products. This Defendant is a resident of the State of Texas.

19. Although Defendant **FISONS CORPORATION**, for its Desenex line of products, has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said corporation may be served with process at its registered agent in Massachusetts, Corporation Service Company, 84 State Street, Boston, MA 02109. Defendant **FISONS CORPORATION**, for its Desenex line of products, may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a manufacturer of asbestos-containing Desenex Foot Powder.

20. Although Defendant **GSK CONSUMER HEALTH, INC.** f/k/a **NOVARTIS CONSUMER HEALTH INC.** f/k/a **CIBA SELF-MEDICATION, INC.**, for its Desenex line of products, has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said corporation may be served with process at its registered agent in Delaware, Corporation Service Company, 251 Little Falls Drive, Wilmington, DE 19808. Defendant **GSK CONSUMER HEALTH, INC.** f/k/a **NOVARTIS CONSUMER HEALTH INC.** f/k/a **CIBA SELF-MEDICATION, INC.**, for its Desenex line of products, may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a manufacturer of asbestos-containing Desenex Foot Powder.

21. Although Defendant **L'OREAL USA, INC.** has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said corporation may be served with process at its registered agent in Delaware, The Prentice-Hall Corporation System, 251 Little Falls Drive, Wilmington, DE 19808. Defendant **L'OREAL USA, INC.** may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a manufacturer of asbestos-containing L'Oreal pressed face powder, L'Oreal blushes, and L'Oreal eyeshadows.

22. Although Defendant **MAYBELLINE LLC** has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said limited liability company may be served with

process at its registered agent in New York, Corporation Service Company, 80 State Street, Albany, NY 12207. Defendant **MAYBELLINE LLC** may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a manufacturer of asbestos-containing Maybelline pressed face powder, Maybelline blushes, and Maybelline eyeshadows.

23. Defendant **MERCK & CO., INC.**, for its Dr. Scholl's line of products, may be served through its registered agent for service of process, CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, TX 75201. This Defendant is being sued as a manufacturer of asbestos-containing Dr. Scholl's Foot Powder.

24. Although Defendant **NOVARTIS CORPORATION** (sued individually and as a successor-in-interest to CIBA-GEIGY CORPORATION and its subsidiaries CIBA CONSUMER PHARMACEUTICALS and CIBA SELF-MEDICATION, INC.), for its Desenex line of products, has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said corporation may be served with process at its registered agent in New York, The Prentice Hall Corporation System, 80 State Street, Albany, NY 12207. Defendant **NOVARTIS CORPORATION** (sued individually and as a successor-in-interest to CIBA-GEIGY CORPORATION and its subsidiaries CIBA CONSUMER PHARMACEUTICALS and CIBA SELF-MEDICATION, INC.), for its Desenex line of products, may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a manufacturer of asbestos-containing Desenex Foot Powder.

25. Defendant **PFIZER INC.** may be served through its registered agent for service of process, CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, TX 75201. This Defendant is being sued as a supplier of asbestos-containing talc.

26. Although Defendant **PRESPERSE CORPORATION** has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said corporation may be served with process at its registered agent in Delaware, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. Defendant **PRESPERSE CORPORATION** may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a supplier of asbestos-containing talc.

27. Although Defendant **PRESPERSE INTERNATIONAL CORP** has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said corporation may be served with process at its registered agent in New Jersey, CT Corporation System, 820 Bear Tavern Road, W. Trenton, NJ 08628. Defendant **PRESPERSE INTERNATIONAL CORP** may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a supplier of asbestos-containing talc.

28. Although Defendant **PTI UNION, LLC** a/k/a **PHARMA TECH INDUSTRIES**, for its Desenex line of products, has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said limited liability company may be served with process at its registered agent in Delaware, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. Defendant **PTI UNION, LLC** a/k/a **PHARMA TECH INDUSTRIES**, for its Desenex line of products, may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a manufacturer of asbestos-containing Desenex Foot Powder.

29. Although Defendant **REVLON CONSUMER PRODUCTS CORPORATION** has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said corporation may be served with process at its registered agent in Delaware, Corporate Creations Network Inc., 3411 Silverside Road, Tatnall Building, Suite 104, Wilmington, DE 19810. Defendant **REVLON CONSUMER PRODUCTS CORPORATION** may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a manufacturer of asbestos-containing Revlon pressed face powder, Revlon blushes and Revlon eyeshadows.

30. Although Defendant **SANOFI-AVENTIS U.S. LLC** (sued individually and as successor by merger to AVENTIS PHARMACEUTICALS INC.), for its Desenex line of products, has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said limited liability company may be served with process at its registered agent in Delaware, Corporation Service Company, 251 Little Falls Drive, Wilmington, DE 19808. Defendant **SANOFI-AVENTIS U.S. LLC** (sued individually and as successor by merger to AVENTIS PHARMACEUTICALS INC.), for its Desenex line of products, may be served through the Secretary of State for the State of

Texas. This Defendant is being sued as a manufacturer of asbestos-containing Desenex Foot Powder.

31. Although Defendant **SCHOLL'S WELLNESS COMPANY LLC**, for its Dr. Scholl's line of products, has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said limited liability company may be served with process at its registered agent in Delaware, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. Defendant **SCHOLL'S WELLNESS COMPANY LLC**, for its Dr. Scholl's line of products, may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a manufacturer of asbestos-containing Dr. Scholl's Foot Powder.

32. Defendant **SPECIALTY MINERALS INC.** (sued individually and as a subsidiary of MINERALS TECHNOLOGIES INC.) may be served through its registered agent for service of process, CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, TX 75201. This Defendant is being sued as a supplier of asbestos-containing talc.

33. Although Defendant **WHITTAKER CLARK & DANIELS, INC.** has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said corporation may be served with process at its registered agent in New Jersey, Joe Cobuzio, Tompkins, McGuire, Wacenfeld, et al., 3 Becker Farm Road, 4th Floor, Roseland, NJ 07068. Defendant **WHITTAKER CLARK & DANIELS, INC.** may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a supplier of asbestos-containing talc.

34. This action is brought and these allegations are made pursuant to Tex. Civ. Prac. & Rem. Code § 71.031.

#### FACTUAL SUMMARY

35. Plaintiff ALVARO ALVARADO was wrongfully exposed to and inhaled or otherwise absorbed asbestos fibers, an inherently dangerous toxic substance, as described below:

Plaintiffs allege that Plaintiff ALVARO ALVARADO experienced exposure to asbestos through his regular and frequent personal use of Desenex Foot Powder from approximately 1990 to the late 2010s, Dr. Scholl's Foot Powder from approximately 1995 to 2001, and Johnson's Baby Powder from approximately 2006 to 2016. Plaintiff was also exposed to asbestos through

Plaintiff MARIA LLANES' regular and frequent use of Clinique eyeshadows from approximately 1990 to 1998, Maybelline face powders, Maybelline blushes, Maybelline eyeshadows, Revlon face powders, Revlon blushes, Revlon eyeshadows, L'Oreal face powders, L'Oreal blushes, and L'Oreal eyeshadows from approximately 2006 to the late 2010s, and Johnson's Baby Powder from approximately 2006 to 2016 while in close proximity to Plaintiff. Plaintiff was also exposed to asbestos during Plaintiffs' use of Johnson's Baby Powder on their daughter as an infant and small child from approximately 2006 to 2016. During these time periods, Plaintiff was also exposed to asbestos-containing talc supplied by Barretts Minerals Inc., Brenntag North America, Inc. (sued individually and as successor-in-interest to Mineral Pigment Solutions, Inc. and as successor-in-interest to Whittaker Clark & Daniels, Inc.), Brenntag Specialties, LLC f/k/a Brenntag Specialties, Inc. f/k/a Mineral Pigment Solutions, Inc. (sued individually and as successor-in-interest to Whittaker Clark & Daniels, Inc.), Color Techniques, Inc., Cosmetic Specialties, Inc. (sued individually and formerly d/b/a G&G Specialty Products Co.) for its Dr. Scholl's line of products, Pfizer Inc., Presperse Corporation, Presperse International Corp, Specialty Minerals Inc. (sued individually and as a subsidiary of Minerals Technologies Inc.), and Whittaker Clark & Daniels, Inc., and asbestos-containing talcum powder and cosmetics products supplied by Fiesta Mart, L.L.C. Plaintiff experienced these exposures at his personal residences in Dallas, Texas. Plaintiff ALVARO ALVARADO's regular and frequent personal use of Desenex Foot Powder, Dr. Scholl's Foot Powder, and Johnson's Baby Powder, Plaintiff MARIA LLANES' regular and frequent use of Maybelline face powders, Maybelline blushes, Maybelline eyeshadows, Revlon face powders, Revlon blushes, Revlon eyeshadows, L'Oreal face powders, L'Oreal blushes, L'Oreal eyeshadows, Johnson's Baby Powder and Clinique eyeshadows while in close proximity to Plaintiff, and Plaintiffs' regular and frequent use of Johnson's Baby Powder on their daughter generated asbestos-containing dust and exposed Plaintiff ALVARO ALVARADO to respirable asbestos fibers. While

Plaintiff MARIA LLANES used asbestos-containing talcum powder and cosmetic products, dangerously high levels of asbestos fibers were released into the air at their personal residences. These fibers were frequently inhaled by Plaintiff ALVARO ALVARADO through contact with Plaintiff MARIA LLANES.

**COUNT ONE**

**ALLEGATIONS AGAINST TALC MANUFACTURING DEFENDANTS**

36. Plaintiffs allege that Plaintiff ALVARO ALVARADO was exposed to asbestos-containing products, and/or asbestos-containing talc, and/or other finished and unfinished asbestos-containing talcum powder products, and/or talc-containing cosmetics, and/or raw asbestos fiber of various kinds and grades through Plaintiff's personal use of talcum powder products and Plaintiff MARIA LLANES' use of talcum powder products and talc-containing cosmetics while in close proximity to Plaintiff. Each Defendant corporation or its predecessors-in-interest is, or at times material hereto, has been engaged in the mining, processing and/or manufacturing, sale and distribution of asbestos-containing products, and/or asbestos-containing talc, and/or other finished and unfinished asbestos-containing talcum powder products, and/or talc-containing cosmetics, and/or raw asbestos fiber of various kinds and grades (hereinafter collectively referred to as "Defendants' Products"). Plaintiffs would show that Plaintiff ALVARO ALVARADO was exposed, on numerous occasions, to Defendants' Products which were produced and/or sold by Defendants and in so doing, inhaled great quantities of asbestos fibers. Further, Plaintiffs allege as more specifically set out below, that Plaintiff ALVARO ALVARADO has suffered injuries, illnesses, and disabilities proximately caused by his exposure to Defendants' Products which were designed, manufactured and sold by Defendants. In that each exposure to Defendants' Products caused or contributed to Plaintiff ALVARO ALVARADO's injuries, illnesses and disabilities, Plaintiffs say that the doctrine of joint and several liabilities should be extended to apply to each Defendant herein.

37. Plaintiff ALVARO ALVARADO was exposed to Defendants' Products that were manufactured, designed and/or distributed by the Defendants and/or their predecessors-in-interest through Plaintiff's personal use of Defendants' Products, and Plaintiff MARIA LLANES' use of Defendants' Products while in close proximity to Plaintiff. Plaintiffs would show that the defective design and condition of Defendants' Products rendered said Products unreasonably dangerous, and that Defendants' Products were in this defective condition at the time they were designed by and/or

left the hands of Defendants. Plaintiffs would show that Defendants' Products were defective in the manner in which they were marketed for their failure to contain or include adequate warnings regarding potential asbestos health hazards associated with the use of or the exposure to Defendants' Products, were defectively designed because they were more dangerous than would be contemplated by an ordinary user, the risks of Defendants' Products outweighed their benefits, and were defectively manufactured as they failed to comply with Defendants' own specifications and protect against asbestos exposure. Plaintiffs would show that this market defect rendered Defendants' Products unreasonably dangerous at the time they were designed or left the hands of the Defendants. Plaintiffs would show that Defendants are liable in product liability including, but not limited to, strict product liability for the above-described defects.

38. The Defendants are or were engaged in the business of selling, manufacturing, producing, designing and/or otherwise putting into the stream of commerce Defendants' Products, and those Products, without substantial change in the condition in which they were sold, manufactured, produced, designed and/or otherwise put into the stream of commerce, were a proximate and/or producing cause of the injuries, illnesses and disabilities of Plaintiff ALVARO ALVARADO.

39. Defendants knew that Defendants' Products would be used without inspection for defects and, by placing them on the market, represented that they would safely do the job for which they were intended, which must necessarily include the safe manipulation, personal use and/or handling of Defendants' Products.

40. Plaintiffs ALVARO ALVARADO and MARIA LLANES were unaware of the hazards and defects in Defendants' Products which made them unsafe for purposes of manipulation, personal use and/or handling.

41. During the periods that Plaintiff ALVARO ALVARADO was exposed to Defendants' Products which were manufactured and sold by various Defendants, those Products were being utilized in a manner which was intended by Defendants.

42. In the event that Plaintiffs are unable to identify each of Plaintiff ALVARO ALVARADO's injurious exposures to Defendants' Products, Plaintiffs would show the Court that the Defendants named herein represent and/or represented a substantial share of the relevant market of Defendants' Products at all times material to this cause of action. Consequently, each Defendant

should be held jointly and severally liable under the doctrines of enterprise liability, market-share liability, concert of action and alternative liability, among others.

43. The injuries, illnesses and disabilities of Plaintiff ALVARO ALVARADO are a direct and proximate result of the negligence of each Defendant and/or its predecessors-in-interest in that said entities produced, designed, sold and/or otherwise put into the stream of commerce Defendants' Products which the Defendants knew, or in the exercise of ordinary care should have known, were deleterious and highly harmful to Plaintiff's health and well-being. Certain Defendants created hazardous and deadly conditions to which Plaintiff was exposed and which caused Plaintiff to be exposed to a large amount of asbestos fibers. The Defendants were negligent in one, some and/or all of the following respects, among others, same being the proximate cause of Plaintiff's injuries, illnesses, and disabilities:

- (a) in failing to timely and adequately warn Plaintiffs and others of the dangerous characteristics and serious health hazards associated with exposure to Defendants' Products;
- (b) in failing to provide Plaintiffs and others with information as to what would be reasonably safe and sufficient wearing apparel and proper protective equipment, if in truth there were any, to protect Plaintiff ALVARO ALVARADO and others from being harmed and disabled by exposure to Defendants' Products;
- (c) in failing to place timely and adequate warnings on the containers of Defendants' Products or on Defendants' Products themselves to warn of the dangers to health of coming into contact with Defendants' Products;
- (d) in failing to take reasonable precautions or exercise reasonable care to publish, adopt and enforce a safety plan and/or safe method and manner of manipulation, personal use and/or handling of Defendants' Products;
- (e) in failing to develop and utilize a substitute material or design to eliminate asbestos fibers in Defendants' Products;
- (f) in failing to properly design and manufacture Defendants' Products for safe use under conditions of use that were reasonably anticipated;
- (g) in failing to properly test Defendants' Products before they were released for use; and

(h) in failing to recall and/or remove Defendants' Products from the stream of commerce despite knowledge of the unsafe and dangerous nature of Defendants' Products.

**COUNT TWO**

**ALLEGATIONS AGAINST ASBESTOS-CONTAINING TALC SUPPLIER AND  
ASBESTOS-CONTAINING PRODUCT SUPPLIER DEFENDANTS**

44. All of the allegations contained in the previous paragraphs are realleged herein.

45. For all pertinent times, Defendants BARRETT'S MINERALS INC.; BRENNTAG NORTH AMERICA, INC. (sued individually and as successor-in-interest to MINERAL PIGMENT SOLUTIONS, INC. and as successor-in-interest to WHITTAKER CLARK & DANIELS, INC.), BRENNTAG SPECIALTIES, LLC f/k/a BRENNTAG SPECIALTIES, INC. f/k/a MINERAL PIGMENT SOLUTIONS, INC. (sued individually and as successor-in-interest to WHITTAKER CLARK & DANIELS, INC.), COLOR TECHNIQUES, INC., COSMETIC SPECIALTIES, INC. (sued individually and formerly d/b/a G&G SPECIALTY PRODUCTS CO.) for its Dr. Scholl's line of products, FIESTA MART, L.L.C., PFIZER INC., PRESUPERSE CORPORATION, PRESUPERSE INTERNATIONAL CORP, SPECIALTY MINERALS INC. (sued individually and as a subsidiary of MINERALS TECHNOLOGIES INC.), and WHITTAKER CLARK & DANIELS, INC. (hereinafter collectively referred to as "Supplier Defendants") individually sold, distributed, and supplied asbestos-containing products, and/or asbestos-containing talc, and/or other finished and unfinished asbestos-containing talcum powder products, and/or talc-containing cosmetics, and/or raw asbestos fiber of various kinds and grades (hereinafter collectively referred to as "Supplier Defendants' Products") that Plaintiff ALVARO ALVARADO came in contact with and inhaled, thereby causing his injuries, illnesses and disabilities.

46. Supplier Defendants as manufacturers, miners, shippers, distributors, and suppliers of Supplier Defendants' Products to various locations owned and/or operated by asbestos product manufacturers are liable to Plaintiffs for their failure to warn of the health hazards of exposure to asbestos and failure to design and package Supplier Defendants' Products so as to adequately protect and warn users and bystanders of the dangers of exposure to asbestos.

47. Further, Supplier Defendants are liable to Plaintiff ALVARO ALVARADO as professional vendors of Supplier Defendants' Products, and as such, because of the Defendants' size, volume of business and merchandising practices, knew or should have known of the defects of the

Products they sold and/or supplied, and are strictly liable and negligent for failing to warn users and bystanders of potential health hazards from the use of said Products.

48. Further, Supplier Defendants made misrepresentations regarding the safety of asbestos to the asbestos-product manufacturers, thereby fraudulently inducing other sophisticated users to use Supplier Defendants' Products instead of other types. As such, Supplier Defendants are liable to Plaintiff ALVARO ALVARADO for his suffering and injuries from a disease caused by exposure to Supplier Defendants' Products because Supplier Defendants' fraudulent misrepresentations were detrimentally relied upon (1) by asbestos-product manufacturers incorporating raw asbestos fiber of various kinds and grades into Supplier Defendants' and others' finished Products and (2) by Plaintiff ALVARO ALVARADO who was exposed to Supplier Defendants' Products.

49. Finally, Supplier Defendants are liable to Plaintiffs because they knew or should have known that Supplier Defendants' Products which they sold and supplied were unreasonably dangerous in normal use, and their failure to communicate this information constitutes negligence. This negligence was the cause of Plaintiff ALVARO ALVARADO's illnesses, injuries and disabilities including, but not limited to, asbestos-related mesothelioma and other ill health effects.

**COUNT THREE**  
**CONSPIRACY ALLEGATIONS AGAINST ALL DEFENDANTS**

50. All of the allegations contained in the previous paragraphs are realleged herein.

51. Plaintiffs further allege that Defendants and/or their predecessors-in-interest knowingly agreed, contrived, combined, confederated and conspired among themselves and with other entities to cause Plaintiff ALVARO ALVARADO's illnesses, injuries and disabilities by exposing him to harmful and dangerous Defendants' Products. Defendants and other entities further knowingly agreed, contrived, combined, confederated and conspired to deprive Plaintiffs ALVARO ALVARADO and MARIA LLANES of the opportunity of informed free choice as to whether to use Defendants' Products or to expose Plaintiff ALVARO ALVARADO to said dangers. Defendants committed the above-described wrongs by willfully misrepresenting and suppressing the truth as to the risks and dangers associated with the use of and exposure to Defendants' Products.

52. In furtherance of said conspiracies, Defendants performed the following overt acts:

- (a) for many decades, Defendants individually, jointly, and in conspiracy with each other and other entities have been in possession of medical and

scientific data, literature and test reports, which clearly indicated that the inhalation of asbestos dust and fibers resulting from the ordinary and foreseeable use of Defendants' Products was unreasonably dangerous, hazardous, deleterious to human health, carcinogenic, and potentially deadly;

- (b) despite the medical and scientific data, literature and test reports possessed by and available to Defendants, Defendants individually, jointly, and in conspiracy with each other and other entities fraudulently, willfully, and maliciously:
  - (1) withheld, concealed, and suppressed said medical and scientific data, literature and test reports regarding the risks of cancer, mesothelioma and other illnesses and diseases from Plaintiffs ALVARO ALVARADO and MARIA LLANES who were using and Plaintiff ALVARO ALVARADO was being exposed to Defendants' Products;
  - (2) caused to be released, published and disseminated medical and scientific data, literature and test reports containing information and statements regarding the risks of cancer, mesothelioma and other illnesses and diseases, which Defendants knew were incorrect, incomplete, outdated and misleading; and
  - (3) distorted the results of medical examinations conducted upon individuals such as Plaintiff ALVARO ALVARADO, who was using or in close proximity to Defendants' Products and being exposed to the inhalation of asbestos dust and fibers, by falsely stating and/or concealing the nature and extent of the harm to which Plaintiff and others such as Plaintiff have suffered.
- (c) Other conspirators participating in the conspiracy, or in ongoing or subsequent conspiracies (hereinafter called the "conspirators"), were member companies in the Quebec Asbestos Mining Association, and/or Asbestos Textile Institute, and/or the Cosmetic Toiletry and Fragrance Association (now Personal Care Products Council), and/or the Industrial Hygiene Foundation. Acting in concert, the conspirators fraudulently misrepresented to the public and public officials, *inter alia*, that asbestos did not cause

cancer and that the disease mesothelioma had no association with pleural and pulmonary cancer and affirmatively suppressed information concerning the carcinogenic and other adverse effects of asbestos exposure on the human respiratory and digestive systems.

- (d) In addition, Defendants contrived, combined, confederated and conspired through a series of industry trade meetings and the creation of organizations such as the Air Hygiene Foundation (later the Industrial Hygiene Foundation) to establish authoritative standards for the control of industrial dusts which would act as a defense in personal injury lawsuits, despite knowing that compliance with such standards would not protect individuals such as Plaintiff ALVARO ALVARADO from contracting an asbestos-related disease or cancer.
- (e) In furtherance of said conspiracies, Defendants and/or their co-conspirators contributed to cause the establishment of a Threshold Limit Value for asbestos exposure, and contributed to the maintenance of such Threshold Limit Value despite evidence that this supposed “safe” level of exposure to asbestos would not protect the health of individuals such as Plaintiff ALVARO ALVARADO even if complied with.
- (f) As the direct and proximate result of the false and fraudulent representations, omissions and concealments set forth above, Defendants individually, jointly, and in conspiracy with each other intended to induce Plaintiffs ALVARO ALVARADO and MARIA LLANES to rely upon said false and fraudulent representations, omissions and concealments, and to continue to expose Plaintiff ALVARO ALVARADO to the dangers inherent in the use of and exposure to Defendants' Products, which caused the release of respirable asbestos fibers.

53. Plaintiffs reasonably and in good faith relied upon the false and fraudulent representations, omissions and concealments made by Defendants regarding the nature of Defendants' Products.

54. As a direct and proximate result of Plaintiffs' reliance on Defendants' false and fraudulent representations, omissions and concealments, Plaintiff ALVARO ALVARADO sustained

damages including injuries, illnesses and disabilities and was deprived of the opportunity of informed free choice in connection with the use of and exposure to Defendants' Products.

**COUNT FOUR**  
**GROSS NEGLIGENCE/MALICE ALLEGATIONS AGAINST ALL DEFENDANTS**

55. All of the allegations contained in the previous paragraphs are realleged herein.

56. The actions and inactions of Defendants and their predecessors-in-interest, as specifically alleged hereinabove, whether taken separately or together, were of such a character as to constitute a pattern or practice of gross negligence, intentional wrongful conduct and/or malice resulting in damages and injuries to Plaintiff ALVARO ALVARADO. Defendants' conduct was specifically intended by Defendants to cause substantial injury to Plaintiff, or was carried out by Defendants with a conscious and flagrant disregard for the rights, safety and welfare of others and with actual awareness on the part of Defendants that the conduct would, in reasonable probability, result in human deaths and/or great bodily harm. More specifically, Defendants and their predecessors-in-interest consciously and/or deliberately engaged in oppression, fraud, willfulness, wantonness and/or malice with regard to Plaintiff ALVARO ALVARADO and should be held liable in punitive and exemplary damages to Plaintiffs.

**COUNT FIVE**  
**AIDING AND ABETTING ALLEGATIONS AGAINST ALL DEFENDANTS**

57. All of the allegations contained in the previous paragraphs are realleged herein.

58. The actions of all Defendants aided, abetted, encouraged, induced or directed the negligent and/or intentional acts of each and every other Defendant.

59. Each of the Defendants knew or should have known that its individual actions would combine to cause the injuries, illnesses and disabilities of Plaintiff ALVARO ALVARADO .

60. The actions of each of the Defendants is a proximate cause of Plaintiff ALVARO ALVARADO's injuries, illnesses and disabilities. As a result, all Defendants are jointly liable for the damage caused by their combined actions.

**COUNT SIX**  
**NEGLIGENCE PER SE ALLEGATIONS AGAINST ALL DEFENDANTS**

61. All of the allegations contained in the previous paragraphs are realleged herein.

62. The actions of all Defendants also constituted negligence per-se.

63. Each Defendant violated federal and state regulations relating to asbestos exposure. Such violations constitute negligence per-se or negligence as a matter of law. Further, each such violation resulted in dangerous and unlawful exposures to asbestos for Plaintiff ALVARO ALVARADO. Plaintiffs are not making any claims under federal law; instead, Plaintiffs are simply using the violation of federal standards as proof of liability on their state-law theories. Further, the reference to Federal regulations does not create a Federal question. See *Merrell Dow Pharmaceuticals, Inc. v. Thompson*, 478 U.S. 804 (1986). Any removal on this basis will be met with an immediate motion for remand and for sanctions.

64. The negligence per-se of each Defendant was a proximate cause of Plaintiff ALVARO ALVARADO's injuries, illnesses and disabilities.

**COUNT SEVEN**  
**(FRAUD AGAINST ALL DEFENDANTS)**

65. All of the allegations contained in the previous paragraphs are realleged herein.

66. **Fraudulent Misrepresentation:** All Defendants are liable for their fraudulent misrepresentations:

(a) First, each of these Defendants, via its employees, agents, advertisements, or any other authorized person or document, represented that certain facts were true when they were not, and made material representations that were false. The specific identities of these employees, agents, advertisements, or any other authorized person or document are maintained in Defendants' records. Such records remain in the exclusive control of Defendants pursuant to Defendants' respective document-retention policies. While Plaintiffs do not currently know all of the specific advertisements, or the names of all of the employees, agents, or any other authorized person who made the representations, Plaintiffs will have access to this information once discovery has commenced and will be able to specifically name the advertisements as well as the employees, agents, or any other authorized persons.

(b) Second, Defendants represented that the asbestos-containing products they manufactured, supplied, or specified for use were not hazardous to humans. These representations, including material misrepresentations, were made before and during the years that Plaintiffs ALVARO ALVARADO and MARIA LLANES purchased, used, and Plaintiff ALVARO ALVARADO was exposed to asbestos from Defendants' asbestos-containing talc, asbestos-containing talcum powder products, and asbestos-containing cosmetic products. Such material

representations were made either directly to Plaintiffs or to a third party intending and reasonably expecting that the substance of those material representations would be repeated to Plaintiffs.

(c) Third, Defendants knew that the material representations were false when they made them, or they made the material representations recklessly and without regard for their truth. Defendants material representations and conduct were false statements and material representations of fact.

(d) Fourth, Defendants intended that Plaintiffs ALVARO ALVARADO and MARIA LLANES, and/or the same class of persons as Plaintiffs rely and act on the material representations or their substance.

(e) Fifth, Plaintiffs ALVARO ALVARADO and MARIA LLANES reasonably relied on Defendants' material and false representations or the substance of these material and false representations.

(f) Sixth, Plaintiff ALVARO ALVARADO developed mesothelioma.

(g) Seventh, Plaintiffs ALVARO ALVARADO's and MARIA LLANES' justifiable reliance on those material representations was a substantial factor in causing Plaintiff ALVARO ALVARADO's mesothelioma and the resulting damages thereto.

67. **Conspiracy to Commit Fraudulent Misrepresentation:** Plaintiffs hereby incorporate by reference the allegations of Paragraph 66 of this Seventh Cause of Action as if fully stated herein. All Defendants are liable for their conspiracy to commit fraudulent material misrepresentation:

(a) First, Defendants were aware that their conspirators, which included all co-Defendants and others, planned to commit fraudulent material misrepresentation against Plaintiff ALVARO ALVARADO, and/or the same class of persons as Plaintiff.

(b) Second, Defendants agreed with their conspirators and intended that the false and fraudulent material misrepresentation, including material misrepresentations of fact, be committed.

(c) Third, Plaintiff ALVARO ALVARADO developed mesothelioma.

(d) Fourth, each Defendant's participation in the conspiracy was a substantial factor in causing Plaintiff's mesothelioma and the resulting damages thereto.

68. **Knowledge of Hazards:** At all times pertinent hereto, all Defendants owed Plaintiff ALVARO ALVARADO a duty, as provided for in Restatement (Second) of Torts §525-551, to abstain from injuring his person, property, or rights. In violation of that duty, these Defendants, and

each of them, did do the acts and omissions, when a duty to act was imposed as set forth herein, thereby proximately causing injury to Plaintiff. Such acts and omissions consisted of acts falling within Restatement (Second) of Torts §525-551, and more specifically were (i) suggestions of material facts which were not true and which the Defendants did not believe to be true, (ii) assertions of material facts of that which were not true, which the Defendants had no reasonable ground for believing to be true, and (iii) the suppression of material facts when a duty existed to disclose them, all as are more fully set forth herein, and the violation of which as to any one such item gave rise to a cause of action for violation of Plaintiffs' rights as provided for in the aforementioned Restatement (Second) of Torts §525-551.

69. Since 1924, all of the Defendants have known and possessed of the true material facts (consisting of medical and scientific data and other knowledge) which clearly indicated that the asbestos-containing talc, asbestos-containing talcum powder products, and asbestos-containing cosmetics referred to herein were hazardous to the health and safety of Plaintiff ALVARO ALVARADO and others similarly situated. Defendants engaged in the following acts and omissions:

(a) Did not label any of the aforementioned asbestos-containing products as to the hazards of said products to the health and safety of Plaintiff ALVARO ALVARADO, and others in Plaintiffs' positions using and Plaintiff being exposed to said products when the knowledge of such hazards was existing and known to Defendants, and each of them, since 1924. By not labeling Defendants' asbestos-containing products as to their said hazards, Defendants, and each of them, caused to be suggested as a fact to Plaintiffs that it was safe for them to use said products, when in fact these things were not true and Defendants did not believe them to be true.

(b) Suppressed information relating to the danger of using the asbestos-containing talc, asbestos-containing talcum powder products, and asbestos-containing cosmetics by requesting the suppression of information to Plaintiffs, Plaintiffs' class of persons, and the general public concerning the dangerous nature of the aforementioned products to all persons, including users, bystanders and household members, by not allowing such information to be disseminated in a manner which would give general notice to the public and knowledge of the hazardous nature thereof when Defendants were bound to disclose such information.

(c) Sold the aforementioned asbestos-containing products to the public, including Plaintiffs and others in Texas and other states without advising them of the dangers of use of said

products and dangers to those persons' household members, when Defendants knew of such dangers as set forth herein and above, and had a duty to disclose such dangers. Thus, Defendants caused to be positively asserted to Plaintiffs and the public that which was not true and which Defendants had no reasonable ground for believing to be true, in a manner not warranted by the information possessed by said Defendants, and each of them, of that which was and is not true, to wit, that it was safe for Plaintiffs to use said products and that they did not pose a risk of harm to Plaintiff ALVARO ALVARADO .

(d) Suppressed and continue to suppress from everyone, including Plaintiffs, medical, scientific data, and knowledge of the accurate results of studies including, but not limited to, Waldemar C. Dreesen of the United States Public Health Service's 1933 report to the National Safety Council, the results of a study conducted among tremolite, talc and slate workers. The study indicated that the talc was a hydrous calcium magnesium silicate, being 45% talc and 45% tremolite, and the National Safety Council stated "The results of the study seemed to indicate a relationship between the amount of dust inhaled and the effect of this dust on the lungs of the workers." As early as 1934, the National Safety Council was publishing information stating that "a cause of severe pulmonary injury is asbestos, a silicéte of magnesium." In the September 1935 issue of National Safety News, an article entitled *No Halfway Measures in Dust Control* by Arthur S. Johnson reported lowered lung capacity resulting from "mesothelioma" and "similar conditions" that developed "from exposure to excess of many mineral dusts relatively low in free silica content." The article further noted that claims for disabilities from workers who alleged exposure to "clay, talc, emery, and carborundum dusts" had "claims prosecuted successfully." The article concluded that "[i]n the absence of adequate diagnoses, occupational histories and a more satisfactory method of adjudicating claims than prosecution at common law, we must conclude that it is necessary to find a practical method for controlling all mineral dusts."

(e) Belonged to, participated in, and financially supported the Industrial Hygiene Foundation, Asbestos Information Association, the Asbestos Textile Institute (ATI), the Cosmetic, Toiletry, and Fragrance Association (now known as the Personal Care Products Council), and other industry organizations which actively promoted the suppression of information of danger to users of asbestos-containing talc and asbestos-containing talcum powder products for and on behalf of Defendants, and each of them, thereby misleading Plaintiffs to their prejudice through the suggestions and deceptions set forth above in this cause of action. ATI's Dust Control Committee,

which changed its name to the Air Hygiene Committee of ATI, was specifically enjoined to study the subject of dust control; discussions in such committee were held many times of (i) the dangers inherent in asbestos and the dangers which arise from the lack of control of dust and (ii) the suppression of such information from 1946 to a date unknown to Plaintiffs at this time.

(f) Knew and possessed medical and scientific information of the connection between inhalation of asbestos fibers and mesothelioma in 1930 with the study of mine and mill workers at the Thetford asbestos mines in Quebec, Canada, and the study of workers at Raybestos-Manhattan plants in Manheim and Charleston, South Carolina. This information was disseminated through the ATI and other industry organizations to all other Defendants, and each of them herein. Between 1942 and 1950, Defendants, and each of them, knew and possessed medical and scientific information of the connection between inhalation of asbestos fibers and cancer, which information was disseminated through the ATI and other industry organizations to all other Defendants herein. Thereby, Defendants suggested as fact that which is not true and disseminated other facts likely to and did mislead Plaintiffs for want of communication of true facts, which consisted of the previously described medical and scientific data and other knowledge by not giving Plaintiffs the true facts concerning such knowledge of danger, when Defendants were bound to disclose them.

(g) Failed to warn Plaintiffs and others similarly situated regarding the nature of Defendants' asbestos-containing talc, asbestos-containing talcum powder products, and asbestos-containing cosmetics. In 1968, a study presented at the American Industrial Hygiene Conference and published in the American Industrial Hygiene Association Journal concluded that "[all] of the 22 talcum products analyzed have a... fiber content... averaging 19%. The fibrous-material was predominantly talc but contained minor amounts of tremolite, anthophyllite, and chrysotile as these are often present in fibrous talc mineral deposits. Unknown significant amounts of such materials in products that may be used without precautions may create an unsuspected problem." [Cralley, L.J., et al.; *Fibrous and Mineral Content of Cosmetic Talcum Products*, 29 Ant Ind. Hyg. Assoc. J.350 (1968).] Defendants failed to warn Plaintiffs and others similarly situated that their asbestos-containing talc, asbestos-containing talcum powder products, and asbestos-containing cosmetics are, among other things, dangerous when breathed and cause pathological effects without noticeable trauma, although Defendants possessed knowledge that such products were dangerous and a threat to the health of persons coming into contact therewith and under a duty to disclose it.

(h) Concealed from Plaintiff ALVARO ALVARADO and others similarly situated the true nature of their exposure, the fact that Defendants knew that exposure to respirable asbestos meant that Plaintiff ALVARO ALVARADO would inhale this asbestos, significantly increasing his risk of developing mesothelioma, lung cancer, and mesothelioma; that Plaintiff had in fact been exposed to respirable asbestos; that the materials to which Plaintiff was exposed would cause pathological effects in the human body without noticeable or perceptible trauma to warn him of injury; and Defendants engaged in these acts and omissions while under a duty to and bound to disclose this information.

(i) Failed to provide information to the public at large and buyers, users and physicians of Plaintiff ALVARO ALVARADO for the purpose of conducting physical examinations of anyone who came in contact with asbestos as to the true nature of the hazards of asbestos, in order for such physicians to diagnose and treat individuals coming into contact with asbestos, in that the materials to which Plaintiff had been exposed would cause pathological effects without noticeable trauma, even though Defendants were under a duty to supply such information and such failure was and is likely to mislead persons, including Plaintiff, as to the dangers and risk of harm to which they were exposed.

(j) Affirmatively misrepresented that their asbestos-containing talc, asbestos-containing talcum powder products and asbestos-containing cosmetics were safe to use and handle, when Defendants knew such statements were false when made, or made said false statements recklessly and without regard for whether the statements were true.

70. Each of the foregoing acts, suggestions, assertions, and forbearances to act when a duty existed to act, the said Defendants and each of them, having such knowledge, knowing Plaintiffs did not have such knowledge and Plaintiff ALVARO ALVARADO would breathe the asbestos-containing talc, asbestos-containing talcum powder products, and asbestos-containing cosmetics innocently, was done falsely and fraudulently and with full intent to induce Plaintiff to be in a dangerous environment and to cause him to remain unaware of the true facts, all in violation of Restatement (Second) of Torts §525-551.

**COUNT EIGHT**  
**BASIS FOR PUNITIVE DAMAGES**

71. All of the allegations contained in the previous paragraphs are realleged herein.

72. **Malice, Oppression, and Fraud:** Plaintiffs hereby incorporate by reference the allegations of all causes of action as if fully stated herein. All Defendants are liable for punitive damages because they engaged in the conduct that caused Plaintiffs harm with malice, oppression, or fraud.

(a) First, Defendants committed malice in that they acted with intent to harm when they caused Plaintiff ALVARO ALVARADO's asbestos exposures, and because their conduct was despicable and was done with a willful and knowing disregard of the rights and safety of others.

(b) Second, these Defendants committed oppression in that their conduct was despicable and subjected Plaintiff ALVARO ALVARADO to cruel and unjust hardship and knowingly disregarded his rights.

(c) Third, the Defendants committed fraud in that they intentionally and fraudulently concealed and misrepresented material facts and did so intending to harm Plaintiff, or with reckless disregard for whether their fraud would harm Plaintiff.

73. These Defendants' conduct constituting malice, oppression, and fraud was committed by, authorized by, and adopted by one or more officers, directors, and managing agents within the corporate hierarchy of each Defendant, who acted on behalf of each Defendant.

74. As a direct and proximate result of such intentional conduct by Defendants, their "alternate entities", and each of them, Plaintiff ALVARO ALVARADO sustained the injuries, illnesses, disabilities, and damages alleged herein.

### **DAMAGES**

75. The conduct of Defendants, as alleged hereinabove, was a direct, proximate and producing cause of the damages resulting from the asbestos-related disease of Plaintiff ALVARO ALVARADO, and of the following general and special damages including:

- (a) Damages to punish Defendants for proximately causing Plaintiff ALVARO ALVARADO's untimely injuries, illnesses, and disabilities;
- (b) Physical pain and mental anguish sustained by Plaintiff ALVARO ALVARADO in the past;
- (c) Physical pain and mental anguish that Plaintiff ALVARO ALVARADO, in reasonable probability, will sustain in the future;
- (d) The past disfigurement suffered by Plaintiff ALVARO ALVARADO ;

- (e) The future disfigurement that Plaintiff ALVARO ALVARADO will, in reasonable probability, sustain in the future;
- (f) The physical impairment sustained by Plaintiff ALVARO ALVARADO in the past;
- (g) The physical impairment that Plaintiff ALVARO ALVARADO will, in reasonable probability, sustain in the future;
- (h) Medical expenses incurred by Plaintiff ALVARO ALVARADO in the past;
- (i) The medical expenses that Plaintiff ALVARO ALVARADO will, in reasonable probability, sustain in the future;
- (j) Plaintiff ALVARO ALVARADO's lost earning capacity sustained in the past;
- (k) Loss of household services sustained by Plaintiff MARIA LLANES in the past;
- (l) The loss of household services that, in reasonable probability, Plaintiff MARIA LLANES will sustain in the future;
- (m) The loss of consortium sustained by Plaintiff MARIA LLANES in the past;
- (n) The loss of consortium that, in reasonable probability, Plaintiff MARIA LLANES will sustain in the future.
- (o) Plaintiffs seek punitive and exemplary damages.
- (p) Any and all other recoverable personal injury, survival, and/or wrongful death damages for Plaintiffs and Plaintiffs' heirs.

76. By their acts and omissions described herein, Defendants intentionally, knowingly and/or recklessly caused serious bodily injury to Plaintiff ALVARO ALVARADO within the meaning of Tex.Civ.Prac.& Rem. Code §41.008(c)(7) and Tex. Penal Code §22.04.

77. Plaintiffs filed suit within two (2) years of Defendants' wrongdoing, which Defendants had and continue to wrongfully conceal.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs demand judgment against the Defendants, and each of them, jointly and severally, for general damages, for their costs expended herein, for interest on said judgment from the date this action accrued until paid, at the legal rate, and for such other and further relief, both at law and in equity, to which Plaintiffs may show themselves justly entitled.

**JURY DEMAND**

Plaintiffs demand that all issues of fact in this case be tried to a properly impaneled jury.

Respectfully submitted,

**SIMON GREENSTONE PANATIER, PC**

*/s/ Jennifer Montemayor*

JENNIFER MONTEMAYOR  
State Bar No. 24098129  
1201 Elm Street, Suite 3400  
Dallas, Texas 75270  
214-276-7680 Telephone  
214-276-7699 Facsimile  
[jmontemayor@sgptrial.com](mailto:jmontemayor@sgptrial.com)

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STUART J. PURDY (CA)  
LISA M. BARLEY (CA)  
LEAH C. KAGAN (CA, NJ, NY)  
CHARLES E. SOECHTING, JR. (PA, TX)

ASSOCIATES  
DEBBIE BRYANT (TX)  
TYSON B. GAMBLE (CA, OR, WA)  
ANDREW M. GROUS (NJ, NY, PA)  
JACEY L. HORNECKER (TX)  
SEAN KERLEY (NY, SC)

# SIMON GREENSTONE PANATIER

TRIAL LAWYERS

ATTORNEYS & COUNSELORS AT LAW  
A Professional Corporation  
[www.SGPTRIAL.com](http://www.SGPTRIAL.com)

PLEASE RESPOND TO THE TEXAS OFFICE

June 16, 2021

DC-21-07664

**VIA E-FILING**

Hon. Felicia Pitre  
Dallas County District Clerk  
George Allen Courts Building  
600 Commerce Street, Suite 103  
Dallas, TX 75202

Re: **REQUEST FOR CITATIONS:**

Alvaro Alvarado and Maria Llanes vs. Aventis Inc., for its Desenex line of products, et al.

Dear Ms. Pitre:

Please issue 30 citations (23 to be served via the Texas Secretary of State) for the list of defendants attached to this letter for the above-referenced matter:

Please email the citations to me at [mjaminet@sgptrial.com](mailto:mjaminet@sgptrial.com) and I will attach the citations to the appropriate number of copies of the file-stamped Original Complaint and Jury Demand.

Thank you very much for your assistance in this regard. Please do not hesitate to call me at 214-687-3231 if you have any questions.

Sincerely,

*/s/Mary Jaminet*  
Mary Jaminet  
Paralegal

LOS ANGELES:  
3780 Kilroy Airport Way, Suite 540  
Long Beach, California 90806  
562-590-3400 (T)  
562-590-3412 (F)

DALLAS (Primary Office):  
1201 Elm St., Suite 3400  
Dallas, Texas 75270  
214-276-7680 (T)  
214-276-7699 (F)

NEW YORK:  
5 Penn Plaza, Suite 2308  
New York, New York 10001  
212-634-1690 (T)  
214-320-0526 (F)

ALVARO ALVARADO and MARIA HANES,

*Plaintiffs,*

vs.

AVENTIS INC. for its Desenex line of products  
Via the Texas Secretary of State  
Corporation Service Company  
2595 Interstate Drive, Suite 103  
Harrisburg, PA 17110

BARRETT'S MINERALS INC.  
CT Corporation System  
1999 Bryan Street, Suite 900  
Dallas, TX 75201-3140

BAYER CONSUMER CARE HOLDINGS LLC f/k/a BAYER CONSUMER CARE LLC f/k/a  
MSD CONSUMER CARE, INC.) for its Dr. Scholl's line of products  
Via the Texas Secretary of State  
Corporation Service Company  
251 Little Falls Drive  
Wilmington, DE 19808

BAYER HEALTHCARE LLC, a subsidiary of BAYER AG, for its Dr. Scholl's line of products  
Corporation Service Company d/b/a Lawyers Incorporating Service Company  
211 E. 7th Street, Suite 620  
Austin, TX 78701-3218

BRENNTAG NORTH AMERICA, INC. (sued individually and as successor-in-interest to  
MINERAL PIGMENT SOLUTIONS, INC. and as successor-in-interest to WHITTAKER  
CLARK & DANIELS, INC.)  
Via the Texas Secretary of State  
The Corporation Trust Company  
Corporation Trust Center  
1209 Orange Street  
Wilmington, DE 19801

BRENNTAG SPECIALTIES, LLC f/k/a BRENNTAG SPECIALTIES, INC. f/k/a MINERAL  
PIGMENT SOLUTIONS, INC. (sued individually and as successor-in-interest to WHITTAKER  
CLARK & DANIELS, INC.)  
CT Corporation System  
1999 Bryan Street, Suite 900  
Dallas, TX 75201-3140

CLINIQUE LABORATORIES, INC., a subsidiary of THE ESTÉÉ LAUDER COMPANIES INC.

Via the Texas Secretary of State  
Corporation Service Company  
80 State Street  
Albany, NY 12207

CLINIQUE LABORATORIES, LLC, a subsidiary of THE ESTÉÉ LAUDER COMPANIES INC.

Via the Texas Secretary of State  
Corporation Service Company  
251 Little Falls Drive  
Wilmington, DE 19808

COLOR TECHNIQUES, INC.

Via the Texas Secretary of State  
Salvatore Giampapa  
1202 Laurel Oak Road, Suite 205  
Voorhies, NJ 08043

COSMETIC SPECIALTIES, INC. (sued individually and formerly d/b/a G&G SPECIALTY PRODUCTS CO.)

Via the Texas Secretary of State  
Ronald W. Grexa  
125 White Horse Pike  
Haddon Heights, NJ 08035

CROWN LABORATORIES, INC. for its Desenex line of products

Via the Texas Secretary of State  
Corporation Service Company  
251 Little Falls Drive  
Wilmington, DE 19808

DR. SCHOLL'S LLC

Via the Texas Secretary of State  
Corporation Service Company  
251 Little Falls Drive  
Wilmington, DE 19808

ESTÉÉ LAUDER, INC., a subsidiary of THE ESTÉÉ LAUDER COMPANIES, INC. for its Clinique line of products

Via the Texas Secretary of State  
The Prentice-Hall Corporation System, Inc.  
251 Little Falls Drive  
Wilmington, DE 19808

THE ESTÉE LAUDER COMPANIES, INC. (sued individually and for Len-Ron Manufacturing Co. Inc.) for its Clinique line of products  
Via the Texas Secretary of State  
The Prentice-Hall Corporation System, Inc.  
251 Little Falls Road  
Wilmington, DE 19808

Fiesta Mart, L.L.C.  
CT Corporation System  
1999 Bryan Street, Suite 900  
Dallas, TX 75201-3140

Fisons Corporation for its Desenex line of products;  
Via the Texas Secretary of State  
Corporation Service Company  
84 State Street  
Boston, MA 02109

GSK CONSUMER HEALTH, INC. f/k/a NOVARTIS CONSUMER HEALTH INC. f/k/a CIBA SELF-MEDICATION, INC. for its Desenex line of products  
Via the Texas Secretary of State  
Corporation Service Company  
251 Little Falls Drive  
Wilmington, DE 19808

L'OREAL USA, INC.  
Via the Texas Secretary of State  
The Prentice-Hall Corporation System  
251 Little Falls Drive  
Wilmington, DE 19808

MAYBELLINE LLC  
Via the Texas Secretary of State  
Corporation Service Company  
80 State Street  
Albany, NY 12207

MERCK & CO., INC. for its Dr. Scholl's line of products  
CT Corporation System  
1999 Bryan Street, Suite 900  
Dallas, TX 75201-3140

NOVARTIS CORPORATION (sued individually and as a successor-in-interest to CIBA-GEIGY CORPORATION and its subsidiaries CIBA CONSUMER PHARMACEUTICALS and CIBA SELF-MEDICATION, INC.) for its Desenex line of products

Via the Texas Secretary of State  
The Prentice Hall Corporation System  
80 State Street  
Albany, NY 12207

PFIZER INC.  
CT Corporation System  
1999 Bryan Street, Suite 900  
Dallas, TX 75201-3140

PRESPERSE CORPORATION  
Via the Texas Secretary of State  
The Corporation Trust Company  
Corporation Trust Center  
1209 Orange Street  
Wilmington, DE 19801

PRESPERSE INTERNATIONAL CORP  
Via the Texas Secretary of State  
CT Corporation System  
820 Bear Tavern Road  
W. Trenton, NJ 08628

PTI UNION, LLC a/k/a PHARMA TECH INDUSTRIES for its Desenex line of products  
Via the Texas Secretary of State  
The Corporation Trust Company  
Corporation Trust Center  
1209 Orange Street  
Wilmington, DE 19801

REVLON CONSUMER PRODUCTS CORPORATION  
Via the Texas Secretary of State  
Corporate Creations Network Inc.  
3411 Silverside Road  
Tatnall Building, Suite 104  
Wilmington, DE 19810

SANOFI-AVENTIS U.S. LLC (sued individually and as successor by merger to AVENTIS PHARMACEUTICALS INC.) for its Desenex line of products  
Via the Texas Secretary of State  
Corporation Service Company  
251 Little Falls Drive  
Wilmington, DE 19808

SCHOLL'S WELLNESS COMPANY LLC for its Dr. Scholl's line of products  
Via the Texas Secretary of State  
The Corporation Trust Company  
Corporation Trust Center  
1209 Orange Street  
Wilmington, DE 19801

SPECIALTY MINERALS INC. (sued individually and as a subsidiary of MINERALS  
TECHNOLOGIES INC.)  
CT Corporation System  
1999 Bryan Street, Suite 900  
Dallas, TX 75201-3140

WHITTAKER CLARK & DANIELS, INC.  
Via the Texas Secretary of State  
Joe Cobuzio  
Tompkins, McGuire, Wacenfeld, et al.  
3 Becker Farm Road, 4th Floor  
Roseland, NJ 07068



FELICIA PITRE  
DALLAS COUNTY DISTRICT CLERK

NINA MOUNTIQUE  
CHIEF DEPUTY

**CAUSE NO. DC-21-07664**

ALVARO ALVARADO, et al

VS.

AVENTIS INC., et al

160th District Court

**ENTER DEMAND FOR JURY**

JURY FEE PAID BY: PLAINTIFF

FEE PAID: \$40

**FORM NO. 3534 CITATION**

**THE STATE OF TEXAS**

**To:** AVENTIS INC.  
BY SERVING THE SECRETARY OF STATE  
OFFICE OF THE SECRETARY OF STATE  
CITATIONS UNIT - P.O. BOX 12079  
AUSTIN, TX, 78711

**GREETINGS:**

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **160th District Court** at 600 Commerce Street, Dallas Texas, 75202.

Said **PLAINTIFF** being ALVARO ALVARADO AND MARIA LLANES

Filed in said Court on the **16th day of June, 2021** against

AVENTIS INC., BAYER CONSUMER CARE HOLDINGS LLC F/K/A BAYER CONSUMER CARE LLC F/K/A MSD CONSUMER CARE, INC., BAYER HEALTHCARE LLC, A SUBSIDIARY OF BAYER AG, BRENNAG NORTH AMERICA, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO MINERAL PIGMENT SOLUTIONS, INC. AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), BRENNAG SPECIALTIES, LLC F/K/A BRENNAG SPECIALTIES, INC. F/K/A MINERAL PIGMENT SOLUTIONS, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), CLINIQUE LABORATORIES, INC., A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., CLINIQUE LABORATORIES, LLC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., COLOR TECHNIQUES, INC., COSMETIC SPECIALTIES, INC. (SUED INDIVIDUALLY AND FORMERLY D/B/A G&G SPECIALTY PRODUCTS CO.), CROWN LABORATORIES, INC, DR. SCHOLL'S LLC, ESTEE LAUDER, INC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES, INC, THE ESTEE LAUDER COMPANIES, INC. (SUED INDIVIDUALLY AND FOR LEN-RON MANUFACTURING CO. INC.), FIESTA MART, L.L.C., FISONS CORPORATION, GSK CONSUMER HEALTH, INC. F/K/A NOVARTIS CONSUMER HEALTH INC. F/K/A CIBA SELF-MEDICATION, INC. L'OREAL USA, INC., MAYBELLINE LLC, MERCK & CO., INC., NOVARTIS CORPORATION (SUED INDIVIDUALLY AND AS A SUCCESSOR-IN-INTEREST TO CIBA-GEIGY CORPORATION AND ITS SUBSIDIARIES CIBA CONSUMER PHARMACEUTICALS AND CIBA SELF-MEDICATION, INC.), PFIZER INC., PRESPERSE CORPORATION, PRESPERSE INTERNATIONAL CORP, PTI UNION, LLC A/K/A PHARMA TECH INDUSTRIES, REVOLON CONSUMER PRODUCTS CORPORATION, SANOFI-AVENTIS U.S. LLC (SUED INDIVIDUALLY AND AS SUCCESSOR BY MERGER TO AVENTIS PHARMACEUTICALS INC.), SCHOLL'S WELLNESS COMPANY LLC, SPECIALTY MINERALS INC., (SUED INDIVIDUALLY AND AS A SUBSIDIARY OF MINERALS TECHNOLOGIES INC.), WHITTAKER CLARK & DANIELS, INC.

For suit, said suit being numbered **DC-21-07664** the nature of which demand is as follows: **Suit On OTHER (CIVIL) etc.**

as shown on said petition a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

**WITNESS:** FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office on **this the 18th day of June, 2021**

ATTEST: FELICIA PITRE Clerk of the District Courts of Dallas, County, Texas

By Kari Malone, Deputy

KARI MALONE



**ESERVE (SOS)**

**CITATION**

No.: **DC-21-07664**

**ALVARO ALVARADO, et al**

**vs.**

**AVENTIS INC., et al**

**ISSUED  
ON THIS THE 18TH DAY  
OF JUNE, 2021**

FELICIA PITRE  
Clerk District Courts,  
Dallas County, Texas

By **KARI MALONE**, Deputy

Attorney for : Plaintiff  
**JENNIFER MONTEMAYOR**  
1201 Elm Street, Suite 3400  
Dallas, Texas 75270  
214-276-7680  
[jmontemayor@sgptrial1.com](mailto:jmontemayor@sgptrial1.com)

**DALLAS COUNTY  
SERVICE FEES  
NOT PAID**

**OFFICER'S RETURN  
FOR INDIVIDUALS**

Cause No. DC-21-07664  
Court No: 160th District Court

Style: ALVARO ALVARADO, et al  
vs.  
AVENTIS INC., et al

Received this Citation the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock. Executed at \_\_\_\_\_, within the County of \_\_\_\_\_, State of \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock, by \_\_\_\_\_ delivering to the within named \_\_\_\_\_ each in person, a copy of this Citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

-----000000-----  
**OFFICER'S RETURN  
FOR CORPORATIONS**

Received this Citation the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_M. Executed at \_\_\_\_\_, within the County of \_\_\_\_\_, State of \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock \_\_\_\_M. by summoning the within named Corporation, \_\_\_\_\_

President - Vice President - Registered Agent - in person, of the said

a true copy of this citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

-----000000-----

The distance actually traveled by me in serving such process was \_\_\_\_\_ miles and my fees are as follows: To certify which witness by my hand.

For Serving Citation \$ \_\_\_\_\_

Sheriff \_\_\_\_\_

For Mileage \$ \_\_\_\_\_

County of \_\_\_\_\_

For Notary \$ \_\_\_\_\_

State of \_\_\_\_\_

Total Fees \$ \_\_\_\_\_

By \_\_\_\_\_

(Must be verified if served outside the State of Texas)

State of \_\_\_\_\_

County of \_\_\_\_\_

Signed and sworn to me by the said \_\_\_\_\_ before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, to certify which witness my hand and seal of office.

Seal

State & County of \_\_\_\_\_

**FORM NO. 3534 CITATION**

**THE STATE OF TEXAS**

**To:** BAYER CONSUMER CARE HOLDINGS LLC F/K/A BAYER CONSUMER CARE LLC F/K/A MSD CONSUMER CARE, INC.)  
BY SERVING THE SECRETARY OF STATE  
OFFICE OF THE SECRETARY OF STATE  
CITATIONS UNIT - P.O. BOX 12079  
AUSTIN, TX, 78711

**GREETINGS:**

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **160th District Court** at 600 Commerce Street, Dallas Texas, 75202.

Said **PLAINTIFF** being ALVARO ALVARADO AND MARIA LLANES

Filed in said Court on the **16th day of June, 2021** against

AVENTIS INC., BAYER CONSUMER CARE HOLDINGS LLC F/K/A BAYER CONSUMER CARE LLC F/K/A MSD CONSUMER CARE, INC., BAYER HEALTHCARE LLC, A SUBSIDIARY OF BAYER AG, BRENNTAG NORTH AMERICA, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO MINERAL PIGMENT SOLUTIONS, INC. AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), BRENNTAG SPECIALTIES, LLC F/K/A BRENNTAG SPECIALTIES, INC. F/K/A MINERAL PIGMENT SOLUTIONS, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), CLINIQUÉ LABORATORIES, INC., A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., CLINIQUÉ LABORATORIES, LLC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., COLOR TECHNIQUES, INC., COSMETIC SPECIALTIES, INC. (SUED INDIVIDUALLY AND FORMERLY D/B/A G&G SPECIALTY PRODUCTS CO.), CROWN LABORATORIES, INC, DR. SCHOLL'S LLC, ESTEE LAUDER, INC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES, INC, THE ESTEE LAUDER COMPANIES, INC. (SUED INDIVIDUALLY AND FOR LEN-RON MANUFACTURING CO. INC.), FIESTA MART, L.L.C., FISONS CORPORATION, GSK CONSUMER HEALTH, INC. F/K/A NOVARTIS CONSUMER HEALTH INC. F/K/A CIBA SELF-MEDICATION, INC. L'OREAL USA, INC., MAYBELLINE LLC, MERCK & CO., INC., NOVARTIS CORPORATION (SUED INDIVIDUALLY AND AS A SUCCESSOR-IN-INTEREST TO CIBA-GEIGY CORPORATION AND ITS SUBSIDIARIES CIBA CONSUMER PHARMACEUTICALS AND CIBA SELF-MEDICATION, INC.), PFIZER INC., PRESPERSE CORPORATION, PRESPERSE INTERNATIONAL CORP, PTI UNION, LLC A/K/A PHARMA TECH INDUSTRIES, REVOLON CONSUMER PRODUCTS CORPORATION, SANOFI-AVENTIS U.S. LLC (SUED INDIVIDUALLY AND AS SUCCESSOR BY MERGER TO AVENTIS PHARMACEUTICALS INC.), SCHOLL'S WELLNESS COMPANY LLC, SPECIALTY MINERALS INC., (SUED INDIVIDUALLY AND AS A SUBSIDIARY OF MINERALS TECHNOLOGIES INC.), WHITTAKER CLARK & DANIELS, INC.

For suit, said suit being numbered **DC-21-07664** the nature of which demand is as follows: **Suit On OTHER (CIVIL) etc.**

as shown on said petition a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

**WITNESS:** FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office on **this the 18th day of June, 2021**

ATTEST: FELICIA PITRE Clerk of the District Courts of Dallas, County, Texas

By



KARI MALONE

, Deputy



**ESERVE (SOS)**

**CITATION**

No.: **DC-21-07664**

**ALVARO ALVARADO, et al**

**vs.**

**AVENTIS INC., et al**

**ISSUED  
ON THIS THE 18TH DAY  
OF JUNE, 2021**

FELICIA PITRE  
Clerk District Courts,  
Dallas County, Texas

By **KARI MALONE**, Deputy

Attorney for : Plaintiff  
**JENNIFER MONTEMAYOR**  
1201 Elm Street, Suite 3400  
Dallas, Texas 75270  
214-276-7680  
[jmontemayor@sgptrial1.com](mailto:jmontemayor@sgptrial1.com)

**DALLAS COUNTY  
SERVICE FEES  
NOT PAID**

**OFFICER'S RETURN  
FOR INDIVIDUALS**

Cause No. DC-21-07664  
Court No: 160th District Court

Style: ALVARO ALVARADO, et al  
vs.  
AVENTIS INC., et al

Received this Citation the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock. Executed at \_\_\_\_\_, within the County of \_\_\_\_\_, State of \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock, by \_\_\_\_\_ delivering to the within named \_\_\_\_\_ each in person, a copy of this Citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

-----000000-----  
**OFFICER'S RETURN  
FOR CORPORATIONS**

Received this Citation the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_M. Executed at \_\_\_\_\_, within the County of \_\_\_\_\_, State of \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock \_\_\_\_M. by summoning the within named Corporation, \_\_\_\_\_

President - Vice President - Registered Agent - in person, of the said

a true copy of this citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

-----000000-----

The distance actually traveled by me in serving such process was \_\_\_\_\_ miles and my fees are as follows: To certify which witness by my hand.

For Serving Citation \$ \_\_\_\_\_

Sheriff \_\_\_\_\_

For Mileage \$ \_\_\_\_\_

County of \_\_\_\_\_

For Notary \$ \_\_\_\_\_

State of \_\_\_\_\_

Total Fees \$ \_\_\_\_\_

By \_\_\_\_\_

(Must be verified if served outside the State of Texas)

State of \_\_\_\_\_

County of \_\_\_\_\_

Signed and sworn to me by the said \_\_\_\_\_ before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, to certify which witness my hand and seal of office.

Seal

State & County of \_\_\_\_\_

**FORM NO. 3534 CITATION  
THE STATE OF TEXAS**

**To:** BRENNTAG NORTH AMERICA, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO MINERAL PIGMENT SOLUTIONS, INC. AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.)  
BY SERVING THE SECRETARY OF STATE  
OFFICE OF THE SECRETARY OF STATE  
CITATIONS UNIT - P.O. BOX 12079  
AUSTIN, TX, 78711

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **160th District Court** at 600 Commerce Street, Dallas Texas, 75202.

Said PLAINTIFF being ALVARO ALVARADO AND MARIA LLANES

Filed in said Court on the **16th day of June, 2021** against

AVENTIS INC., BAYER CONSUMER CARE HOLDINGS LLC F/K/A BAYER CONSUMER CARE LLC F/K/A MSD CONSUMER CARE, INC., BAYER HEALTHCARE LLC, A SUBSIDIARY OF BAYER AG, BRENNTAG NORTH AMERICA, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO MINERAL PIGMENT SOLUTIONS, INC. AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), BRENNTAG SPECIALTIES, LLC F/K/A BRENNTAG SPECIALTIES, INC. F/K/A MINERAL PIGMENT SOLUTIONS, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), CLINIQUE LABORATORIES, INC., A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., CLINIQUE LABORATORIES, LLC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., COLOR TECHNIQUES, INC, COSMETIC SPECIALTIES, INC. (SUED INDIVIDUALLY AND FORMERLY D/B/A G&G SPECIALTY PRODUCTS CO.), CROWN LABORATORIES, INC, DR. SCHOLL'S LLC, ESTEE LAUDER, INC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES, INC, THE ESTEE LAUDER COMPANIES, INC. (SUED INDIVIDUALLY AND FOR LEN-RON MANUFACTURING CO. INC.), FIESTA MART, L.L.C., FISONS CORPORATION, GSK CONSUMER HEALTH, INC. F/K/A NOVARTIS CONSUMER HEALTH INC. F/K/A CIBA SELF-MEDICATION, INC. L'OREAL USA, INC., MAYBELLINE LLC, MERCK & CO., INC., NOVARTIS CORPORATION (SUED INDIVIDUALLY AND AS A SUCCESSOR-IN-INTEREST TO CIBA-GEIGY CORPORATION AND ITS SUBSIDIARIES CIBA CONSUMER PHARMACEUTICALS AND CIBA SELF-MEDICATION, INC.), PFIZER INC., PRESPERSE CORPORATION, PRESPERSE INTERNATIONAL CORP, PTI UNION, LLC A/K/A PHARMA TECH INDUSTRIES, REVOLIN CONSUMER PRODUCTS CORPORATION, SANOFI-AVENTIS U.S. LLC (SUED INDIVIDUALLY AND AS SUCCESSOR BY MERGER TO AVENTIS PHARMACEUTICALS INC.), SCHOLL'S WELLNESS COMPANY LLC, SPECIALTY MINERALS INC., (SUED INDIVIDUALLY AND AS A SUBSIDIARY OF MINERALS TECHNOLOGIES INC.), WHITTAKER CLARK & DANIELS, INC.

For suit, said suit being numbered **DC-21-07664** the nature of which demand is as follows: **Suit On OTHER (CIVIL) etc.**

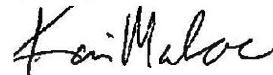
as shown on said petition a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office on this the 18th day of June, 2021

ATTEST: FELICIA PITRE Clerk of the District Courts of Dallas, County, Texas

By



KARI MALONE

, Deputy



**ESERVE (SOS)**

**CITATION**

No.: **DC-21-07664**

**ALVARO ALVARADO, et al**  
vs.  
**AVENTIS INC., et al**

**ISSUED  
ON THIS THE 18TH DAY  
OF JUNE, 2021**

FELICIA PITRE  
Clerk District Courts,  
Dallas County, Texas

By KARI MALONE, Deputy

Attorney for : Plaintiff  
**JENNIFER MONTEMAYOR**  
1201 Elm Street, Suite 3400  
Dallas, Texas 75270  
214-276-7680  
[jmontemayor@sgptrial1.com](mailto:jmontemayor@sgptrial1.com)

**DALLAS COUNTY  
SERVICE FEES  
NOT PAID**

**OFFICER'S RETURN  
FOR INDIVIDUALS**

Cause No. DC-21-07664  
Court No: 160th District Court

Style: ALVARO ALVARADO, et al  
vs.  
AVENTIS INC., et al

Received this Citation the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock. Executed at \_\_\_\_\_, within the County of \_\_\_\_\_, State of \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock, by \_\_\_\_\_ delivering to the within named \_\_\_\_\_ each in person, a copy of this Citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

-----000000-----  
**OFFICER'S RETURN  
FOR CORPORATIONS**

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President - Vice President - Registered Agent - in person, of the said

a true copy of this citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

-----000000-----

The distance actually traveled by me in serving such process was \_\_\_\_\_ miles and my fees are as follows: To certify which witness by my hand.

For Serving Citation \$ \_\_\_\_\_

Sheriff \_\_\_\_\_

For Mileage \$ \_\_\_\_\_

County of \_\_\_\_\_

For Notary \$ \_\_\_\_\_

State of \_\_\_\_\_

Total Fees \$ \_\_\_\_\_

By \_\_\_\_\_

(Must be verified if served outside the State of Texas)

State of \_\_\_\_\_

County of \_\_\_\_\_

Signed and sworn to me by the said \_\_\_\_\_ before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, to certify which witness my hand and seal of office.

Seal

State & County of \_\_\_\_\_

**FORM NO. 3534 CITATION**

**THE STATE OF TEXAS**

**To:** CLINIQUE LABORATORIES, INC., A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC.  
BY SERVING THE SECRETARY OF STATE  
OFFICE OF THE SECRETARY OF STATE  
CITATIONS UNIT - P.O. BOX 12079  
AUSTIN, TX, 78711

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Filed in said Court on the **16th day of June, 2021** against

AVENTIS INC., BAYER CONSUMER CARE HOLDINGS LLC F/K/A BAYER CONSUMER CARE LLC F/K/A MSD CONSUMER CARE, INC., BAYER HEALTHCARE LLC, A SUBSIDIARY OF BAYER AG, BRENNAG NORTH AMERICA, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO MINERAL PIGMENT SOLUTIONS, INC. AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), BRENNAG SPECIALTIES, LLC F/K/A BRENNAG SPECIALTIES, INC. F/K/A MINERAL PIGMENT SOLUTIONS, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), CLINIQUE LABORATORIES, INC., A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., CLINIQUE LABORATORIES, LLC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., COLOR TECHNIQUES, INC, COSMETIC SPECIALTIES, INC. (SUED INDIVIDUALLY AND FORMERLY D/B/A G&G SPECIALTY PRODUCTS CO.), CROWN LABORATORIES, INC, DR. SCHOLL'S LLC, ESTEE LAUDER, INC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES, INC, THE ESTEE LAUDER COMPANIES, INC. (SUED INDIVIDUALLY AND FOR LEN-RON MANUFACTURING CO. INC.), FIESTA MART, L.L.C., FISONS CORPORATION, GSK CONSUMER HEALTH, INC. F/K/A NOVARTIS CONSUMER HEALTH INC. F/K/A CIBA SELF-MEDICATION, INC. L'OREAL USA, INC., MAYBELLINE LLC, MERCK & CO., INC., NOVARTIS CORPORATION (SUED INDIVIDUALLY AND AS A SUCCESSOR-IN-INTEREST TO CIBA-GEIGY CORPORATION AND ITS SUBSIDIARIES CIBA CONSUMER PHARMACEUTICALS AND CIBA SELF-MEDICATION, INC.), PFIZER INC., PRESPERSE CORPORATION, PRESPERSE INTERNATIONAL CORP, PTI UNION, LLC A/K/A PHARMA TECH INDUSTRIES, REVOLON CONSUMER PRODUCTS CORPORATION, SANOFI-AVENTIS U.S. LLC (SUED INDIVIDUALLY AND AS SUCCESSOR BY MERGER TO AVENTIS PHARMACEUTICALS INC.), SCHOLL'S WELLNESS COMPANY LLC, SPECIALTY MINERALS INC., (SUED INDIVIDUALLY AND AS A SUBSIDIARY OF MINERALS TECHNOLOGIES INC.), WHITTAKER CLARK & DANIELS, INC.

For suit, said suit being numbered **DC-21-07664** the nature of which demand is as follows: **Suit On OTHER (CIVIL) etc.**

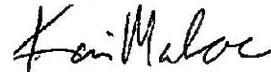
as shown on said petition a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

**WITNESS:** FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office on **this the 18th day of June, 2021**

ATTEST: FELICIA PITRE Clerk of the District Courts of Dallas, County, Texas

By



KARI MALONE

, Deputy



**ESERVE (SOS)**

**CITATION**

No.: **DC-21-07664**

**ALVARO ALVARADO, et al**

**vs.**

**AVENTIS INC., et al**

**ISSUED  
ON THIS THE 18TH DAY  
OF JUNE, 2021**

FELICIA PITRE  
Clerk District Courts,  
Dallas County, Texas

By **KARI MALONE**, Deputy

Attorney for : Plaintiff  
**JENNIFER MONTEMAYOR**  
1201 Elm Street, Suite 3400  
Dallas, Texas 75270  
214-276-7680  
[jmontemayor@sgptrial.com](mailto:jmontemayor@sgptrial.com)

**DALLAS COUNTY  
SERVICE FEES  
NOT PAID**

**OFFICER'S RETURN  
FOR INDIVIDUALS**

Cause No. DC-21-07664  
Court No: 160th District Court

Style: ALVARO ALVARADO, et al  
vs.  
AVENTIS INC., et al

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**OFFICER'S RETURN  
FOR CORPORATIONS**

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President - Vice President - Registered Agent - in person, of the said

a true copy of this citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

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The distance actually traveled by me in serving such process was \_\_\_\_\_ miles and my fees are as follows: To certify which witness by my hand.

For Serving Citation \$ \_\_\_\_\_

Sheriff \_\_\_\_\_

For Mileage \$ \_\_\_\_\_

County of \_\_\_\_\_

For Notary \$ \_\_\_\_\_

State of \_\_\_\_\_

Total Fees \$ \_\_\_\_\_

By \_\_\_\_\_

(Must be verified if served outside the State of Texas)

State of \_\_\_\_\_

County of \_\_\_\_\_

Signed and sworn to me by the said \_\_\_\_\_ before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, to certify which witness my hand and seal of office.

Seal

State & County of \_\_\_\_\_

**FORM NO. 3534 CITATION  
THE STATE OF TEXAS**

**To:** CLINIQUE LABORATORIES, LLC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC.  
BY SERVING THE SECRETARY OF STATE  
OFFICE OF THE SECRETARY OF STATE  
CITATIONS UNIT - P.O. BOX 12079  
AUSTIN, TX, 78711

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AVENTIS INC., BAYER CONSUMER CARE HOLDINGS LLC F/K/A BAYER CONSUMER CARE LLC F/K/A MSD CONSUMER CARE, INC., BAYER HEALTHCARE LLC, A SUBSIDIARY OF BAYER AG, BRENNTAG NORTH AMERICA, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO MINERAL PIGMENT SOLUTIONS, INC. AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), BRENNTAG SPECIALTIES, LLC F/K/A BRENNTAG SPECIALTIES, INC. F/K/A MINERAL PIGMENT SOLUTIONS, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), CLINIQUE LABORATORIES, INC., A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., CLINIQUE LABORATORIES, LLC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., COLOR TECHNIQUES, INC., COSMETIC SPECIALTIES, INC. (SUED INDIVIDUALLY AND FORMERLY D/B/A G&G SPECIALTY PRODUCTS CO.), CROWN LABORATORIES, INC., DR. SCHOLL'S LLC, ESTEE LAUDER, INC., A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES, INC., THE ESTEE LAUDER COMPANIES, INC. (SUED INDIVIDUALLY AND FOR LEN-RON MANUFACTURING CO. INC.), FIESTA MART, L.L.C., FISONS CORPORATION, GSK CONSUMER HEALTH, INC. F/K/A NOVARTIS CONSUMER HEALTH INC. F/K/A CIBA SELF-MEDICATION, INC. L'OREAL USA, INC., MAYBELLINE LLC, MERCK & CO., INC., NOVARTIS CORPORATION (SUED INDIVIDUALLY AND AS A SUCCESSOR-IN-INTEREST TO CIBA-GEIGY CORPORATION AND ITS SUBSIDIARIES CIBA CONSUMER PHARMACEUTICALS AND CIBA SELF-MEDICATION, INC.), PFIZER INC., PRESPERSE CORPORATION, PRESPERSE INTERNATIONAL CORP, PTI UNION, LLC A/K/A PHARMA TECH INDUSTRIES, REVOLON CONSUMER PRODUCTS CORPORATION, SANOFI-AVENTIS U.S. LLC (SUED INDIVIDUALLY AND AS SUCCESSOR BY MERGER TO AVENTIS PHARMACEUTICALS INC.), SCHOLL'S WELLNESS COMPANY LLC, SPECIALTY MINERALS INC., (SUED INDIVIDUALLY AND AS A SUBSIDIARY OF MINERALS TECHNOLOGIES INC.), WHITTAKER CLARK & DANIELS, INC.

For suit, said suit being numbered **DC-21-07664** the nature of which demand is as follows: **Suit On OTHER (CIVIL) etc.**

as shown on said petition a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

**WITNESS:** FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office on **this the 18th day of June, 2021**

ATTEST: FELICIA PITRE Clerk of the District Courts of Dallas, County, Texas

By Kari Malone, Deputy

KARI MALONE



**ESERVE (SOS)**

**CITATION**

No.: **DC-21-07664**

**ALVARO ALVARADO, et al**  
vs.  
**AVENTIS INC., et al**

**ISSUED  
ON THIS THE 18TH DAY  
OF JUNE, 2021**

FELICIA PITRE  
Clerk District Courts,  
Dallas County, Texas

By **KARI MALONE**, Deputy

Attorney for : Plaintiff  
**JENNIFER MONTEMAYOR**  
1201 Elm Street, Suite 3400  
Dallas, Texas 75270  
214-276-7680  
[jmontemayor@sgptrial1.com](mailto:jmontemayor@sgptrial1.com)

**DALLAS COUNTY  
SERVICE FEES  
NOT PAID**

**OFFICER'S RETURN  
FOR INDIVIDUALS**

Cause No. DC-21-07664

Court No: 160th District Court

Style: ALVARO ALVARADO, et al

vs.

AVENTIS INC., et al

Received this Citation the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock. Executed at \_\_\_\_\_, within the County of \_\_\_\_\_, State of \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock, by delivering to the within named \_\_\_\_\_ each in person, a copy of this Citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

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**OFFICER'S RETURN  
FOR CORPORATIONS**

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President - Vice President - Registered Agent - in person, of the said

a true copy of this citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

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The distance actually traveled by me in serving such process was \_\_\_\_\_ miles and my fees are as follows: To certify which witness by my hand.

For Serving Citation \$\_\_\_\_\_ Sheriff \_\_\_\_\_

For Mileage \$\_\_\_\_\_ County of \_\_\_\_\_

For Notary \$\_\_\_\_\_ State of \_\_\_\_\_

Total Fees \$\_\_\_\_\_ By \_\_\_\_\_

(Must be verified if served outside the State of Texas)

State of \_\_\_\_\_

County of \_\_\_\_\_

Signed and sworn to me by the said \_\_\_\_\_ before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, to certify which witness my hand and seal of office.

Seal

State & County of \_\_\_\_\_

**FORM NO. 3534 CITATION**

**THE STATE OF TEXAS**

**To:** COLOR TECHNIQUES, INC.  
BY SERVING THE SECRETARY OF STATE  
OFFICE OF THE SECRETARY OF STATE  
CITATIONS UNIT - P.O. BOX 12079  
AUSTIN, TX, 78711

**GREETINGS:**

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **160th District Court** at 600 Commerce Street, Dallas Texas, 75202.

Said **PLAINTIFF** being ALVARO ALVARADO AND MARIA LLANES

Filed in said Court on the **16th day of June, 2021** against

AVENTIS INC., BAYER CONSUMER CARE HOLDINGS LLC F/K/A BAYER CONSUMER CARE LLC F/K/A MSD CONSUMER CARE, INC., BAYER HEALTHCARE LLC, A SUBSIDIARY OF BAYER AG, BRENNTAG NORTH AMERICA, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO MINERAL PIGMENT SOLUTIONS, INC. AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), BRENNTAG SPECIALTIES, LLC F/K/A BRENNTAG SPECIALTIES, INC. F/K/A MINERAL PIGMENT SOLUTIONS, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), CLINIQUE LABORATORIES, INC., A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., CLINIQUE LABORATORIES, LLC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., COLOR TECHNIQUES, INC., COSMETIC SPECIALTIES, INC. (SUED INDIVIDUALLY AND FORMERLY D/B/A G&G SPECIALTY PRODUCTS CO.), CROWN LABORATORIES, INC, DR. SCHOLL'S LLC, ESTEE LAUDER, INC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES, INC, THE ESTEE LAUDER COMPANIES, INC. (SUED INDIVIDUALLY AND FOR LEN-RON MANUFACTURING CO. INC.), FIESTA MART, L.L.C., FISONS CORPORATION, GSK CONSUMER HEALTH, INC. F/K/A NOVARTIS CONSUMER HEALTH INC. F/K/A CIBA SELF-MEDICATION, INC. L'OREAL USA, INC., MAYBELLINE LLC, MERCK & CO., INC., NOVARTIS CORPORATION (SUED INDIVIDUALLY AND AS A SUCCESSOR-IN-INTEREST TO CIBA-GEIGY CORPORATION AND ITS SUBSIDIARIES CIBA CONSUMER PHARMACEUTICALS AND CIBA SELF-MEDICATION, INC.), PFIZER INC., PRESPERSE CORPORATION, PRESPERSE INTERNATIONAL CORP, PTI UNION, LLC A/K/A PHARMA TECH INDUSTRIES, REVOLON CONSUMER PRODUCTS CORPORATION, SANOFI-AVENTIS U.S. LLC (SUED INDIVIDUALLY AND AS SUCCESSOR BY MERGER TO AVENTIS PHARMACEUTICALS INC.), SCHOLL'S WELLNESS COMPANY LLC, SPECIALTY MINERALS INC., (SUED INDIVIDUALLY AND AS A SUBSIDIARY OF MINERALS TECHNOLOGIES INC.), WHITTAKER CLARK & DANIELS, INC.

For suit, said suit being numbered **DC-21-07664** the nature of which demand is as follows: **Suit On OTHER (CIVIL) etc.**

as shown on said petition a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

**WITNESS:** FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office on **this the 18th day of June, 2021**

ATTEST: FELICIA PITRE Clerk of the District Courts of Dallas, County, Texas

By



KARI MALONE

, Deputy



**ESERVE (SOS)**

**CITATION**

No.: **DC-21-07664**

**ALVARO ALVARADO, et al**

**vs.**

**AVENTIS INC., et al**

**ISSUED  
ON THIS THE 18TH DAY  
OF JUNE, 2021**

FELICIA PITRE  
Clerk District Courts,  
Dallas County, Texas

By **KARI MALONE**, Deputy

Attorney for : Plaintiff  
**JENNIFER MONTEMAYOR**  
1201 Elm Street, Suite 3400  
Dallas, Texas 75270  
214-276-7680  
[jmontemayor@sgptrial1.com](mailto:jmontemayor@sgptrial1.com)

**DALLAS COUNTY  
SERVICE FEES  
NOT PAID**

**OFFICER'S RETURN  
FOR INDIVIDUALS**

Cause No. DC-21-07664  
Court No: 160th District Court

Style: ALVARO ALVARADO, et al  
vs.  
AVENTIS INC., et al

Received this Citation the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock. Executed at \_\_\_\_\_, within the County of \_\_\_\_\_, State of \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock, by \_\_\_\_\_ delivering to the within named \_\_\_\_\_ each in person, a copy of this Citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

-----000000-----  
**OFFICER'S RETURN  
FOR CORPORATIONS**

Received this Citation the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_ M. Executed at \_\_\_\_\_, within the County of \_\_\_\_\_, State of \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock \_\_\_\_ M. by summoning the within named Corporation, \_\_\_\_\_

President - Vice President - Registered Agent - in person, of the said

a true copy of this citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

-----000000-----

The distance actually traveled by me in serving such process was \_\_\_\_\_ miles and my fees are as follows: To certify which witness by my hand.

For Serving Citation \$ \_\_\_\_\_

Sheriff \_\_\_\_\_

For Mileage \$ \_\_\_\_\_

County of \_\_\_\_\_

For Notary \$ \_\_\_\_\_

State of \_\_\_\_\_

Total Fees \$ \_\_\_\_\_

By \_\_\_\_\_

(Must be verified if served outside the State of Texas)

State of \_\_\_\_\_

County of \_\_\_\_\_

Signed and sworn to me by the said \_\_\_\_\_ before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, to certify which witness my hand and seal of office.

Seal

State & County of \_\_\_\_\_

**FORM NO. 3534 CITATION**

**THE STATE OF TEXAS**

**To:** COSMETIC SPECIALTIES, INC. (SUED INDIVIDUALLY AND FORMERLY D/B/A G&G SPECIALTY PRODUCTS CO.)  
BY SERVING THE SECRETARY OF STATE  
OFFICE OF THE SECRETARY OF STATE  
CITATIONS UNIT - P.O. BOX 12079  
AUSTIN, TX, 78711

**GREETINGS:**

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **160th District Court** at 600 Commerce Street, Dallas Texas, 75202.

Said **PLAINTIFF** being ALVARO ALVARADO AND MARIA LLANES

Filed in said Court on the **16th day of June, 2021** against

AVENTIS INC., BAYER CONSUMER CARE HOLDINGS LLC F/K/A BAYER CONSUMER CARE LLC F/K/A MSD CONSUMER CARE, INC., BAYER HEALTHCARE LLC, A SUBSIDIARY OF BAYER AG, BRENNTAG NORTH AMERICA, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO MINERAL PIGMENT SOLUTIONS, INC. AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), BRENNTAG SPECIALTIES, LLC F/K/A BRENNTAG SPECIALTIES, INC. F/K/A MINERAL PIGMENT SOLUTIONS, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), CLINIQUÉ LABORATORIES, INC., A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., CLINIQUÉ LABORATORIES, LLC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., COLOR TECHNIQUES, INC., COSMETIC SPECIALTIES, INC. (SUED INDIVIDUALLY AND FORMERLY D/B/A G&G SPECIALTY PRODUCTS CO.), CROWN LABORATORIES, INC., DR. SCHOLL'S LLC, ESTEE LAUDER, INC., A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES, INC., THE ESTEE LAUDER COMPANIES, INC. (SUED INDIVIDUALLY AND FOR LEN-RON MANUFACTURING CO. INC.), FIESTA MART, L.L.C., FISONS CORPORATION, GSK CONSUMER HEALTH, INC. F/K/A NOVARTIS CONSUMER HEALTH INC. F/K/A CIBA SELF-MEDICATION, INC. L'OREAL USA, INC., MAYBELLINE LLC, MERCK & CO., INC., NOVARTIS CORPORATION (SUED INDIVIDUALLY AND AS A SUCCESSOR-IN-INTEREST TO CIBA-GEIGY CORPORATION AND ITS SUBSIDIARIES CIBA CONSUMER PHARMACEUTICALS AND CIBA SELF-MEDICATION, INC.), PFIZER INC., PRESPERSE CORPORATION, PRESPERSE INTERNATIONAL CORP, PTI UNION, LLC A/K/A PHARMA TECH INDUSTRIES, REVOLON CONSUMER PRODUCTS CORPORATION, SANOFI-AVENTIS U.S. LLC (SUED INDIVIDUALLY AND AS SUCCESSOR BY MERGER TO AVENTIS PHARMACEUTICALS INC.), SCHOLL'S WELLNESS COMPANY LLC, SPECIALTY MINERALS INC., (SUED INDIVIDUALLY AND AS A SUBSIDIARY OF MINERALS TECHNOLOGIES INC.), WHITTAKER CLARK & DANIELS, INC.

For suit, said suit being numbered **DC-21-07664** the nature of which demand is as follows: **Suit On OTHER (CIVIL) etc.**

as shown on said petition a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

**WITNESS:** FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office on **this the 18th day of June, 2021**

ATTEST: FELICIA PITRE Clerk of the District Courts of Dallas, County, Texas

By



KARI MALONE

, Deputy



**ESERVE (SOS)**

**CITATION**

No.: **DC-21-07664**

**ALVARO ALVARADO, et al**

**vs.**

**AVENTIS INC., et al**

**ISSUED  
ON THIS THE 18TH DAY  
OF JUNE, 2021**

FELICIA PITRE  
Clerk District Courts,  
Dallas County, Texas

By **KARI MALONE**, Deputy

Attorney for : Plaintiff  
**JENNIFER MONTEMAYOR**  
1201 Elm Street, Suite 3400  
Dallas, Texas 75270  
214-276-7680  
[jmontemayor@sgptrial1.com](mailto:jmontemayor@sgptrial1.com)

**DALLAS COUNTY  
SERVICE FEES  
NOT PAID**

**OFFICER'S RETURN  
FOR INDIVIDUALS**

Cause No. DC-21-07664  
Court No: 160th District Court

Style: ALVARO ALVARADO, et al  
vs.  
AVENTIS INC., et al

Received this Citation the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock. Executed at \_\_\_\_\_, within the County of \_\_\_\_\_, State of \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock, by \_\_\_\_\_ delivering to the within named \_\_\_\_\_ each in person, a copy of this Citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

-----000000-----  
**OFFICER'S RETURN  
FOR CORPORATIONS**

Received this Citation the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_M. Executed at \_\_\_\_\_, within the County of \_\_\_\_\_, State of \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock \_\_\_\_M. by summoning the within named Corporation, \_\_\_\_\_

President - Vice President - Registered Agent - in person, of the said

a true copy of this citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

-----000000-----

The distance actually traveled by me in serving such process was \_\_\_\_\_ miles and my fees are as follows: To certify which witness by my hand.

For Serving Citation \$ \_\_\_\_\_

Sheriff \_\_\_\_\_

For Mileage \$ \_\_\_\_\_

County of \_\_\_\_\_

For Notary \$ \_\_\_\_\_

State of \_\_\_\_\_

Total Fees \$ \_\_\_\_\_

By \_\_\_\_\_

(Must be verified if served outside the State of Texas)

State of \_\_\_\_\_

County of \_\_\_\_\_

Signed and sworn to me by the said \_\_\_\_\_ before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, to certify which witness my hand and seal of office.

Seal

State & County of \_\_\_\_\_

**FORM NO. 3534 CITATION**

**THE STATE OF TEXAS**

**To:** CROWN LABORATORIES, INC.  
BY SERVING THE SECRETARY OF STATE  
OFFICE OF THE SECRETARY OF STATE  
CITATIONS UNIT - P.O. BOX 12079  
AUSTIN, TX, 78711

**GREETINGS:**

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **160th District Court** at 600 Commerce Street, Dallas Texas, 75202.

Said **PLAINTIFF** being ALVARO ALVARADO AND MARIA LLANES

Filed in said Court on the **16th day of June, 2021** against

AVENTIS INC., BAYER CONSUMER CARE HOLDINGS LLC F/K/A BAYER CONSUMER CARE LLC F/K/A MSD CONSUMER CARE, INC., BAYER HEALTHCARE LLC, A SUBSIDIARY OF BAYER AG, BRENNTAG NORTH AMERICA, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO MINERAL PIGMENT SOLUTIONS, INC. AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), BRENNTAG SPECIALTIES, LLC F/K/A BRENNTAG SPECIALTIES, INC. F/K/A MINERAL PIGMENT SOLUTIONS, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), CLINIQUÉ LABORATORIES, INC., A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., CLINIQUÉ LABORATORIES, LLC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., COLOR TECHNIQUES, INC., COSMETIC SPECIALTIES, INC. (SUED INDIVIDUALLY AND FORMERLY D/B/A G&G SPECIALTY PRODUCTS CO.), CROWN LABORATORIES, INC, DR. SCHOLL'S LLC, ESTEE LAUDER, INC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES, INC, THE ESTEE LAUDER COMPANIES, INC. (SUED INDIVIDUALLY AND FOR LEN-RON MANUFACTURING CO. INC.), FIESTA MART, L.L.C., FISONS CORPORATION, GSK CONSUMER HEALTH, INC. F/K/A NOVARTIS CONSUMER HEALTH INC. F/K/A CIBA SELF-MEDICATION, INC. L'OREAL USA, INC., MAYBELLINE LLC, MERCK & CO., INC., NOVARTIS CORPORATION (SUED INDIVIDUALLY AND AS A SUCCESSOR-IN-INTEREST TO CIBA-GEIGY CORPORATION AND ITS SUBSIDIARIES CIBA CONSUMER PHARMACEUTICALS AND CIBA SELF-MEDICATION, INC.), PFIZER INC., PRESPERSE CORPORATION, PRESPERSE INTERNATIONAL CORP, PTI UNION, LLC A/K/A PHARMA TECH INDUSTRIES, REVOLON CONSUMER PRODUCTS CORPORATION, SANOFI-AVENTIS U.S. LLC (SUED INDIVIDUALLY AND AS SUCCESSOR BY MERGER TO AVENTIS PHARMACEUTICALS INC.), SCHOLL'S WELLNESS COMPANY LLC, SPECIALTY MINERALS INC., (SUED INDIVIDUALLY AND AS A SUBSIDIARY OF MINERALS TECHNOLOGIES INC.), WHITTAKER CLARK & DANIELS, INC.

For suit, said suit being numbered **DC-21-07664** the nature of which demand is as follows: **Suit On OTHER (CIVIL) etc.**

as shown on said petition a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

**WITNESS:** FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office on **this the 18th day of June, 2021**

ATTEST: FELICIA PITRE Clerk of the District Courts of Dallas, County, Texas

By Kari Malone, Deputy

KARI MALONE



**ESERVE (SOS)**

**CITATION**

No.: **DC-21-07664**

**ALVARO ALVARADO, et al**

**vs.**

**AVENTIS INC., et al**

**ISSUED  
ON THIS THE 18TH DAY  
OF JUNE, 2021**

FELICIA PITRE  
Clerk District Courts,  
Dallas County, Texas

By **KARI MALONE**, Deputy

Attorney for : Plaintiff  
**JENNIFER MONTEMAYOR**  
1201 Elm Street, Suite 3400  
Dallas, Texas 75270  
214-276-7680  
[jmontemayor@sgptrial.com](mailto:jmontemayor@sgptrial.com)

**DALLAS COUNTY  
SERVICE FEES  
NOT PAID**

**OFFICER'S RETURN  
FOR INDIVIDUALS**

Cause No. DC-21-07664  
Court No: 160th District Court

Style: ALVARO ALVARADO, et al  
vs.  
AVENTIS INC., et al

Received this Citation the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock. Executed at \_\_\_\_\_, within the County of \_\_\_\_\_, State of \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock, by \_\_\_\_\_ delivering to the within named \_\_\_\_\_ each in person, a copy of this Citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

-----000000-----  
**OFFICER'S RETURN  
FOR CORPORATIONS**

Received this Citation the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_M. Executed at \_\_\_\_\_, within the County of \_\_\_\_\_, State of \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock \_\_\_\_M. by summoning the within named Corporation, \_\_\_\_\_

President - Vice President - Registered Agent - in person, of the said

a true copy of this citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

-----000000-----

The distance actually traveled by me in serving such process was \_\_\_\_\_ miles and my fees are as follows: To certify which witness by my hand.

For Serving Citation \$ \_\_\_\_\_

Sheriff \_\_\_\_\_

For Mileage \$ \_\_\_\_\_

County of \_\_\_\_\_

For Notary \$ \_\_\_\_\_

State of \_\_\_\_\_

Total Fees \$ \_\_\_\_\_

By \_\_\_\_\_

(Must be verified if served outside the State of Texas)

State of \_\_\_\_\_

County of \_\_\_\_\_

Signed and sworn to me by the said \_\_\_\_\_ before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, to certify which witness my hand and seal of office.

Seal

State & County of \_\_\_\_\_

**FORM NO. 3534 CITATION**

**THE STATE OF TEXAS**

**To:** DR. SCHOLL'S LLC  
BY SERVING THE SECRETARY OF STATE  
OFFICE OF THE SECRETARY OF STATE  
CITATIONS UNIT - P.O. BOX 12079  
AUSTIN, TX, 78711

**GREETINGS:**

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **160th District Court** at 600 Commerce Street, Dallas Texas, 75202.

Said **PLAINTIFF** being ALVARO ALVARADO AND MARIA LLANES

Filed in said Court on the **16th day of June, 2021** against

AVENTIS INC., BAYER CONSUMER CARE HOLDINGS LLC F/K/A BAYER CONSUMER CARE LLC F/K/A MSD CONSUMER CARE, INC., BAYER HEALTHCARE LLC, A SUBSIDIARY OF BAYER AG, BRENNAG NORTH AMERICA, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO MINERAL PIGMENT SOLUTIONS, INC. AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), BRENNAG SPECIALTIES, LLC F/K/A BRENNAG SPECIALTIES, INC. F/K/A MINERAL PIGMENT SOLUTIONS, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), CLINIQUE LABORATORIES, INC., A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., CLINIQUE LABORATORIES, LLC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., COLOR TECHNIQUES, INC., COSMETIC SPECIALTIES, INC. (SUED INDIVIDUALLY AND FORMERLY D/B/A G&G SPECIALTY PRODUCTS CO.), CROWN LABORATORIES, INC, DR. SCHOLL'S LLC, ESTEE LAUDER, INC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES, INC, THE ESTEE LAUDER COMPANIES, INC. (SUED INDIVIDUALLY AND FOR LEN-RON MANUFACTURING CO. INC.), FIESTA MART, L.L.C., FISONS CORPORATION, GSK CONSUMER HEALTH, INC. F/K/A NOVARTIS CONSUMER HEALTH INC. F/K/A CIBA SELF-MEDICATION, INC. L'OREAL USA, INC., MAYBELLINE LLC, MERCK & CO., INC., NOVARTIS CORPORATION (SUED INDIVIDUALLY AND AS A SUCCESSOR-IN-INTEREST TO CIBA-GEIGY CORPORATION AND ITS SUBSIDIARIES CIBA CONSUMER PHARMACEUTICALS AND CIBA SELF-MEDICATION, INC.), PFIZER INC., PRESPERSE CORPORATION, PRESPERSE INTERNATIONAL CORP, PTI UNION, LLC A/K/A PHARMA TECH INDUSTRIES, REVOLON CONSUMER PRODUCTS CORPORATION, SANOFI-AVENTIS U.S. LLC (SUED INDIVIDUALLY AND AS SUCCESSOR BY MERGER TO AVENTIS PHARMACEUTICALS INC.), SCHOLL'S WELLNESS COMPANY LLC, SPECIALTY MINERALS INC., (SUED INDIVIDUALLY AND AS A SUBSIDIARY OF MINERALS TECHNOLOGIES INC.), WHITTAKER CLARK & DANIELS, INC.

For suit, said suit being numbered **DC-21-07664** the nature of which demand is as follows: **Suit On OTHER (CIVIL) etc.**

as shown on said petition a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

**WITNESS:** FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office on **this the 18th day of June, 2021**

ATTEST: FELICIA PITRE Clerk of the District Courts of Dallas, County, Texas

By



KARI MALONE

, Deputy



**ESERVE (SOS)**

**CITATION**

No.: **DC-21-07664**

**ALVARO ALVARADO, et al**

**vs.**

**AVENTIS INC., et al**

**ISSUED  
ON THIS THE 18TH DAY  
OF JUNE, 2021**

FELICIA PITRE  
Clerk District Courts,  
Dallas County, Texas

By **KARI MALONE**, Deputy

---

Attorney for : Plaintiff  
**JENNIFER MONTEMAYOR**  
1201 Elm Street, Suite 3400  
Dallas, Texas 75270  
214-276-7680  
**jmontemayor@sgptrial.com**

**DALLAS COUNTY  
SERVICE FEES  
NOT PAID**

**OFFICER'S RETURN  
FOR INDIVIDUALS**

Cause No. DC-21-07664  
Court No: 160th District Court

Style: ALVARO ALVARADO, et al  
vs.  
AVENTIS INC., et al

Received this Citation the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock. Executed at \_\_\_\_\_, within the County of \_\_\_\_\_, State of \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock, by \_\_\_\_\_ delivering to the within named \_\_\_\_\_ each in person, a copy of this Citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

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**OFFICER'S RETURN  
FOR CORPORATIONS**

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President - Vice President - Registered Agent - in person, of the said

a true copy of this citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

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The distance actually traveled by me in serving such process was \_\_\_\_\_ miles and my fees are as follows: To certify which witness by my hand.

For Serving Citation \$ \_\_\_\_\_

Sheriff \_\_\_\_\_

For Mileage \$ \_\_\_\_\_

County of \_\_\_\_\_

For Notary \$ \_\_\_\_\_

State of \_\_\_\_\_

Total Fees \$ \_\_\_\_\_

By \_\_\_\_\_

(Must be verified if served outside the State of Texas)

State of \_\_\_\_\_

County of \_\_\_\_\_

Signed and sworn to me by the said \_\_\_\_\_ before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, to certify which witness my hand and seal of office.

Seal

State & County of \_\_\_\_\_

**FORM NO. 3534 CITATION**

**THE STATE OF TEXAS**

**To:** ESTEE LAUDER, INC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES, INC  
BY SERVING THE SECRETARY OF STATE  
OFFICE OF THE SECRETARY OF STATE  
CITATIONS UNIT - P.O. BOX 12079  
AUSTIN, TX, 78711

**GREETINGS:**

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **160th District Court** at 600 Commerce Street, Dallas Texas, 75202.

Said **PLAINTIFF** being **ALVARO ALVARADO AND MARIA LLANES**

Filed in said Court on the **16th day of June, 2021** against

AVENTIS INC., BAYER CONSUMER CARE HOLDINGS LLC F/K/A BAYER CONSUMER CARE LLC F/K/A MSD CONSUMER CARE, INC., BAYER HEALTHCARE LLC, A SUBSIDIARY OF BAYER AG, BRENNTAG NORTH AMERICA, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO MINERAL PIGMENT SOLUTIONS, INC. AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), BRENNTAG SPECIALTIES, LLC F/K/A BRENNTAG SPECIALTIES, INC. F/K/A MINERAL PIGMENT SOLUTIONS, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), CLINIQUE LABORATORIES, INC., A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., CLINIQUE LABORATORIES, LLC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., COLOR TECHNIQUES, INC, COSMETIC SPECIALTIES, INC. (SUED INDIVIDUALLY AND FORMERLY D/B/A G&G SPECIALTY PRODUCTS CO.), CROWN LABORATORIES, INC, DR. SCHOLL'S LLC, ESTEE LAUDER, INC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES, INC, THE ESTEE LAUDER COMPANIES, INC. (SUED INDIVIDUALLY AND FOR LEN-RON MANUFACTURING CO. INC.), FIESTA MART, L.L.C., FISONS CORPORATION, GSK CONSUMER HEALTH, INC. F/K/A NOVARTIS CONSUMER HEALTH INC. F/K/A CIBA SELF-MEDICATION, INC. L'OREAL USA, INC., MAYBELLINE LLC, MERCK & CO., INC., NOVARTIS CORPORATION (SUED INDIVIDUALLY AND AS A SUCCESSOR-IN-INTEREST TO CIBA-GEIGY CORPORATION AND ITS SUBSIDIARIES CIBA CONSUMER PHARMACEUTICALS AND CIBA SELF-MEDICATION, INC.), PFIZER INC., PRESPERSE CORPORATION, PRESPERSE INTERNATIONAL CORP, PTI UNION, LLC A/K/A PHARMA TECH INDUSTRIES, REVOLON CONSUMER PRODUCTS CORPORATION, SANOFI-AVENTIS U.S. LLC (SUED INDIVIDUALLY AND AS SUCCESSOR BY MERGER TO AVENTIS PHARMACEUTICALS INC.), SCHOLL'S WELLNESS COMPANY LLC, SPECIALTY MINERALS INC., (SUED INDIVIDUALLY AND AS A SUBSIDIARY OF MINERALS TECHNOLOGIES INC.), WHITTAKER CLARK & DANIELS, INC.

For suit, said suit being numbered **DC-21-07664** the nature of which demand is as follows: **Suit On OTHER (CIVIL) etc.**

as shown on said petition a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

**WITNESS:** FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office on **this the 18th day of June, 2021**

ATTEST: FELICIA PITRE Clerk of the District Courts of Dallas, County, Texas

By Kari Malone, Deputy

KARI MALONE



**ESERVE (SOS)**

**CITATION**

No.: **DC-21-07664**

**ALVARO ALVARADO, et al**

**vs.**

**AVENTIS INC., et al**

**ISSUED  
ON THIS THE 18TH DAY  
OF JUNE, 2021**

FELICIA PITRE  
Clerk District Courts,  
Dallas County, Texas

By **KARI MALONE**, Deputy

Attorney for : Plaintiff  
**JENNIFER MONTEMAYOR**  
1201 Elm Street, Suite 3400  
Dallas, Texas 75270  
214-276-7680  
[jmontemayor@sgptrial1.com](mailto:jmontemayor@sgptrial1.com)

**DALLAS COUNTY  
SERVICE FEES  
NOT PAID**

**OFFICER'S RETURN  
FOR INDIVIDUALS**

Cause No. DC-21-07664  
Court No: 160th District Court

Style: ALVARO ALVARADO, et al  
vs.  
AVENTIS INC., et al

Received this Citation the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock. Executed at \_\_\_\_\_, within the County of \_\_\_\_\_, State of \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock, by \_\_\_\_\_ delivering to the within named \_\_\_\_\_ each in person, a copy of this Citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

-----000000-----  
**OFFICER'S RETURN  
FOR CORPORATIONS**

Received this Citation the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_M. Executed at \_\_\_\_\_, within the County of \_\_\_\_\_, State of \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock \_\_\_\_M. by summoning the within named Corporation, \_\_\_\_\_

President - Vice President - Registered Agent - in person, of the said

a true copy of this citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

-----000000-----

The distance actually traveled by me in serving such process was \_\_\_\_\_ miles and my fees are as follows: To certify which witness by my hand.

For Serving Citation \$ \_\_\_\_\_

Sheriff \_\_\_\_\_

For Mileage \$ \_\_\_\_\_

County of \_\_\_\_\_

For Notary \$ \_\_\_\_\_

State of \_\_\_\_\_

Total Fees \$ \_\_\_\_\_

By \_\_\_\_\_

(Must be verified if served outside the State of Texas)

State of \_\_\_\_\_

County of \_\_\_\_\_

Signed and sworn to me by the said \_\_\_\_\_ before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, to certify which witness my hand and seal of office.

Seal

State & County of \_\_\_\_\_

**FORM NO. 3534 CITATION**

**THE STATE OF TEXAS**

**To:** THE ESTEE LAUDER COMPANIES, INC. (SUED INDIVIDUALLY AND FOR LEN-RON MANUFACTURING CO. INC.)  
BY SERVING THE SECRETARY OF STATE  
OFFICE OF THE SECRETARY OF STATE  
CITATIONS UNIT - P.O. BOX 12079  
AUSTIN, TX, 78711

**GREETINGS:**

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **160th District Court** at 600 Commerce Street, Dallas Texas, 75202.

Said **PLAINTIFF** being ALVARO ALVARADO AND MARIA LLANES

Filed in said Court on the **16th day of June, 2021** against

AVENTIS INC., BAYER CONSUMER CARE HOLDINGS LLC F/K/A BAYER CONSUMER CARE LLC F/K/A MSD CONSUMER CARE, INC., BAYER HEALTHCARE LLC, A SUBSIDIARY OF BAYER AG, BRENNTAG NORTH AMERICA, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO MINERAL PIGMENT SOLUTIONS, INC. AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), BRENNTAG SPECIALTIES, LLC F/K/A BRENNTAG SPECIALTIES, INC. F/K/A MINERAL PIGMENT SOLUTIONS, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), CLINIQUE LABORATORIES, INC., A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., CLINIQUE LABORATORIES, LLC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., COLOR TECHNIQUES, INC., COSMETIC SPECIALTIES, INC. (SUED INDIVIDUALLY AND FORMERLY D/B/A G&G SPECIALTY PRODUCTS CO.), CROWN LABORATORIES, INC, DR. SCHOLL'S LLC, ESTEE LAUDER, INC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES, INC, THE ESTEE LAUDER COMPANIES, INC. (SUED INDIVIDUALLY AND FOR LEN-RON MANUFACTURING CO. INC.), FIESTA MART, L.L.C., FISONS CORPORATION, GSK CONSUMER HEALTH, INC. F/K/A NOVARTIS CONSUMER HEALTH INC. F/K/A CIBA SELF-MEDICATION, INC. L'OREAL USA, INC., MAYBELLINE LLC, MERCK & CO., INC., NOVARTIS CORPORATION (SUED INDIVIDUALLY AND AS A SUCCESSOR-IN-INTEREST TO CIBA-GEIGY CORPORATION AND ITS SUBSIDIARIES CIBA CONSUMER PHARMACEUTICALS AND CIBA SELF-MEDICATION, INC.), PFIZER INC., PRESPERSE CORPORATION, PRESPERSE INTERNATIONAL CORP, PTI UNION, LLC A/K/A PHARMA TECH INDUSTRIES, REVOLN CONSUMER PRODUCTS CORPORATION, SANOFI-AVENTIS U.S. LLC (SUED INDIVIDUALLY AND AS SUCCESSOR BY MERGER TO AVENTIS PHARMACEUTICALS INC.), SCHOLL'S WELLNESS COMPANY LLC, SPECIALTY MINERALS INC., (SUED INDIVIDUALLY AND AS A SUBSIDIARY OF MINERALS TECHNOLOGIES INC.), WHITTAKER CLARK & DANIELS, INC.

For suit, said suit being numbered **DC-21-07664** the nature of which demand is as follows: **Suit On OTHER (CIVIL) etc.**

as shown on said petition a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

**WITNESS:** FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office on **this the 18th day of June, 2021**

ATTEST: FELICIA PITRE Clerk of the District Courts of Dallas, County, Texas

By Kari Malone, Deputy

KARI MALONE



**ESERVE (SOS)**

**CITATION**

No.: **DC-21-07664**

**ALVARO ALVARADO, et al**

**vs.**

**AVENTIS INC., et al**

**ISSUED  
ON THIS THE 18TH DAY  
OF JUNE, 2021**

FELICIA PITRE  
Clerk District Courts,  
Dallas County, Texas

By **KARI MALONE**, Deputy

Attorney for : Plaintiff  
**JENNIFER MONTEMAYOR**  
1201 Elm Street, Suite 3400  
Dallas, Texas 75270  
214-276-7680  
**jmontemayor@sgptrial.com**

**DALLAS COUNTY  
SERVICE FEES  
NOT PAID**

**OFFICER'S RETURN  
FOR INDIVIDUALS**

Cause No. DC-21-07664  
Court No: 160th District Court

Style: ALVARO ALVARADO, et al  
vs.  
AVENTIS INC., et al

Received this Citation the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock. Executed at \_\_\_\_\_, within the County of \_\_\_\_\_, State of \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock, by \_\_\_\_\_ delivering to the within named \_\_\_\_\_ each in person, a copy of this Citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

-----000000-----  
**OFFICER'S RETURN  
FOR CORPORATIONS**

Received this Citation the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_M. Executed at \_\_\_\_\_, within the County of \_\_\_\_\_, State of \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock \_\_\_\_M. by summoning the within named Corporation, \_\_\_\_\_

President - Vice President - Registered Agent - in person, of the said

a true copy of this citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

-----000000-----

The distance actually traveled by me in serving such process was \_\_\_\_\_ miles and my fees are as follows: To certify which witness by my hand.

For Serving Citation \$ \_\_\_\_\_ Sheriff \_\_\_\_\_  
For Mileage \$ \_\_\_\_\_ County of \_\_\_\_\_  
For Notary \$ \_\_\_\_\_ State of \_\_\_\_\_  
Total Fees \$ \_\_\_\_\_ By \_\_\_\_\_

(Must be verified if served outside the State of Texas)

State of \_\_\_\_\_  
County of \_\_\_\_\_

Signed and sworn to me by the said \_\_\_\_\_ before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, to certify which witness my hand and seal of office.

Seal

State & County of \_\_\_\_\_

**FORM NO. 3534 CITATION**

**THE STATE OF TEXAS**

**To:** FISONS CORPORATION  
BY SERVING THE SECRETARY OF STATE  
OFFICE OF THE SECRETARY OF STATE  
CITATIONS UNIT - P.O. BOX 12079  
AUSTIN, TX, 78711

**GREETINGS:**

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **160th District Court** at 600 Commerce Street, Dallas Texas, 75202.

Said **PLAINTIFF** being ALVARO ALVARADO AND MARIA LLANES

Filed in said Court on the **16th day of June, 2021** against

AVENTIS INC., BAYER CONSUMER CARE HOLDINGS LLC F/K/A BAYER CONSUMER CARE LLC F/K/A MSD CONSUMER CARE, INC., BAYER HEALTHCARE LLC, A SUBSIDIARY OF BAYER AG, BRENNTAG NORTH AMERICA, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO MINERAL PIGMENT SOLUTIONS, INC. AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), BRENNTAG SPECIALTIES, LLC F/K/A BRENNTAG SPECIALTIES, INC. F/K/A MINERAL PIGMENT SOLUTIONS, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), CLINIQUÉ LABORATORIES, INC., A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., CLINIQUÉ LABORATORIES, LLC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., COLOR TECHNIQUES, INC., COSMETIC SPECIALTIES, INC. (SUED INDIVIDUALLY AND FORMERLY D/B/A G&G SPECIALTY PRODUCTS CO.), CROWN LABORATORIES, INC, DR. SCHOLL'S LLC, ESTEE LAUDER, INC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES, INC, THE ESTEE LAUDER COMPANIES, INC. (SUED INDIVIDUALLY AND FOR LEN-RON MANUFACTURING CO. INC.), FIESTA MART, L.L.C., FISONS CORPORATION, GSK CONSUMER HEALTH, INC. F/K/A NOVARTIS CONSUMER HEALTH INC. F/K/A CIBA SELF-MEDICATION, INC. L'OREAL USA, INC., MAYBELLINE LLC, MERCK & CO., INC., NOVARTIS CORPORATION (SUED INDIVIDUALLY AND AS A SUCCESSOR-IN-INTEREST TO CIBA-GEIGY CORPORATION AND ITS SUBSIDIARIES CIBA CONSUMER PHARMACEUTICALS AND CIBA SELF-MEDICATION, INC.), PFIZER INC., PRESPERSE CORPORATION, PRESPERSE INTERNATIONAL CORP, PTI UNION, LLC A/K/A PHARMA TECH INDUSTRIES, REVOLON CONSUMER PRODUCTS CORPORATION, SANOFI-AVENTIS U.S. LLC (SUED INDIVIDUALLY AND AS SUCCESSOR BY MERGER TO AVENITIS PHARMACEUTICALS INC.), SCHOLL'S WELLNESS COMPANY LLC, SPECIALTY MINERALS INC., (SUED INDIVIDUALLY AND AS A SUBSIDIARY OF MINERALS TECHNOLOGIES INC.), WHITTAKER CLARK & DANIELS, INC.

For suit, said suit being numbered **DC-21-07664** the nature of which demand is as follows: **Suit On OTHER (CIVIL) etc.**

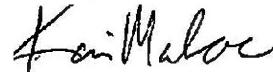
as shown on said petition a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

**WITNESS:** FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office on **this the 18th day of June, 2021**

ATTEST: FELICIA PITRE Clerk of the District Courts of Dallas, County, Texas

By



KARI MALONE

, Deputy



**ESERVE (SOS)**

**CITATION**

No.: **DC-21-07664**

**ALVARO ALVARADO, et al**

**vs.**

**AVENTIS INC., et al**

**ISSUED  
ON THIS THE 18TH DAY  
OF JUNE, 2021**

FELICIA PITRE  
Clerk District Courts,  
Dallas County, Texas

By **KARI MALONE**, Deputy

---

Attorney for : Plaintiff  
**JENNIFER MONTEMAYOR**  
1201 Elm Street, Suite 3400  
Dallas, Texas 75270  
214-276-7680  
**jmontemayor@sgptrial.com**

**DALLAS COUNTY  
SERVICE FEES  
NOT PAID**

**OFFICER'S RETURN  
FOR INDIVIDUALS**

Cause No. DC-21-07664  
Court No: 160th District Court

Style: ALVARO ALVARADO, et al  
vs.  
AVENTIS INC., et al

Received this Citation the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock. Executed at \_\_\_\_\_, within the County of \_\_\_\_\_, State of \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock, by delivering to the within named \_\_\_\_\_ each in person, a copy of this Citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

-----000000-----  
**OFFICER'S RETURN  
FOR CORPORATIONS**

Received this Citation the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_M. Executed at \_\_\_\_\_, within the County of \_\_\_\_\_, State of \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock \_\_\_\_M. by summoning the within named Corporation,

President - Vice President - Registered Agent - in person, of the said

a true copy of this citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

-----000000-----

The distance actually traveled by me in serving such process was \_\_\_\_\_ miles and my fees are as follows: To certify which witness by my hand.

For Serving Citation \$ \_\_\_\_\_

Sheriff \_\_\_\_\_

For Mileage \$ \_\_\_\_\_

County of \_\_\_\_\_

For Notary \$ \_\_\_\_\_

State of \_\_\_\_\_

Total Fees \$ \_\_\_\_\_

By \_\_\_\_\_

(Must be verified if served outside the State of Texas)

State of \_\_\_\_\_

County of \_\_\_\_\_

Signed and sworn to me by the said \_\_\_\_\_ before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, to certify which witness my hand and seal of office.

Seal

State & County of \_\_\_\_\_

**FORM NO. 3534 CITATION**

**THE STATE OF TEXAS**

**To:** GSK CONSUMER HEALTH, INC. F/K/A NOVARTIS CONSUMER HEALTH INC. F/K/A CIBA SELF-MEDICATION, INC.  
BY SERVING THE SECRETARY OF STATE  
OFFICE OF THE SECRETARY OF STATE  
CITATIONS UNIT - P.O. BOX 12079  
AUSTIN, TX, 78711

**GREETINGS:**

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **160th District Court** at 600 Commerce Street, Dallas Texas, 75202.

Said **PLAINTIFF** being ALVARO ALVARADO AND MARIA LLANES

Filed in said Court on the **16th day of June, 2021** against

AVENTIS INC., BAYER CONSUMER CARE HOLDINGS LLC F/K/A BAYER CONSUMER CARE LLC F/K/A MSD CONSUMER CARE, INC., BAYER HEALTHCARE LLC, A SUBSIDIARY OF BAYER AG, BRENNTAG NORTH AMERICA, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO MINERAL PIGMENT SOLUTIONS, INC. AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), BRENNTAG SPECIALTIES, LLC F/K/A BRENNTAG SPECIALTIES, INC. F/K/A MINERAL PIGMENT SOLUTIONS, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), CLINIQUÉ LABORATORIES, INC., A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., CLINIQUÉ LABORATORIES, LLC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., COLOR TECHNIQUES, INC., COSMETIC SPECIALTIES, INC. (SUED INDIVIDUALLY AND FORMERLY D/B/A G&G SPECIALTY PRODUCTS CO.), CROWN LABORATORIES, INC, DR. SCHOLL'S LLC, ESTEE LAUDER, INC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES, INC, THE ESTEE LAUDER COMPANIES, INC. (SUED INDIVIDUALLY AND FOR LEN-RON MANUFACTURING CO. INC.), FIESTA MART, L.L.C., FISONS CORPORATION, GSK CONSUMER HEALTH, INC. F/K/A NOVARTIS CONSUMER HEALTH INC. F/K/A CIBA SELF-MEDICATION, INC. L'OREAL USA, INC., MAYBELLINE LLC, MERCK & CO., INC., NOVARTIS CORPORATION (SUED INDIVIDUALLY AND AS A SUCCESSOR-IN-INTEREST TO CIBA-GEIGY CORPORATION AND ITS SUBSIDIARIES CIBA CONSUMER PHARMACEUTICALS AND CIBA SELF-MEDICATION, INC.), PFIZER INC., PRESPERSE CORPORATION, PRESPERSE INTERNATIONAL CORP, PTI UNION, LLC A/K/A PHARMA TECH INDUSTRIES, REVOLON CONSUMER PRODUCTS CORPORATION, SANOFI-AVENTIS U.S. LLC (SUED INDIVIDUALLY AND AS SUCCESSOR BY MERGER TO AVENTIS PHARMACEUTICALS INC.), SCHOLL'S WELLNESS COMPANY LLC, SPECIALTY MINERALS INC., (SUED INDIVIDUALLY AND AS A SUBSIDIARY OF MINERALS TECHNOLOGIES INC.), WHITTAKER CLARK & DANIELS, INC.

For suit, said suit being numbered **DC-21-07664** the nature of which demand is as follows: **Suit On OTHER (CIVIL) etc.**

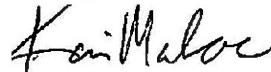
as shown on said petition a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

**WITNESS:** FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office on **this the 18th day of June, 2021**

ATTEST: FELICIA PITRE Clerk of the District Courts of Dallas, County, Texas

By



KARI MALONE

, Deputy



**ESERVE (SOS)**

**CITATION**

No.: **DC-21-07664**

**ALVARO ALVARADO, et al**

**vs.**

**AVENTIS INC., et al**

**ISSUED  
ON THIS THE 18TH DAY  
OF JUNE, 2021**

FELICIA PITRE  
Clerk District Courts,  
Dallas County, Texas

By **KARI MALONE**, Deputy

Attorney for : Plaintiff  
**JENNIFER MONTEMAYOR**  
1201 Elm Street, Suite 3400  
Dallas, Texas 75270  
214-276-7680  
**jmontemayor@sgptrial.com**

**DALLAS COUNTY  
SERVICE FEES  
NOT PAID**

**OFFICER'S RETURN  
FOR INDIVIDUALS**

Cause No. DC-21-07664  
Court No: 160th District Court

Style: ALVARO ALVARADO, et al  
vs.  
AVENTIS INC., et al

Received this Citation the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock. Executed at \_\_\_\_\_, within the County of \_\_\_\_\_, State of \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock, by \_\_\_\_\_ delivering to the within named \_\_\_\_\_ each in person, a copy of this Citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

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**OFFICER'S RETURN  
FOR CORPORATIONS**

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President - Vice President - Registered Agent - in person, of the said

a true copy of this citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

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The distance actually traveled by me in serving such process was \_\_\_\_\_ miles and my fees are as follows: To certify which witness by my hand.

For Serving Citation \$ \_\_\_\_\_

Sheriff \_\_\_\_\_

For Mileage \$ \_\_\_\_\_

County of \_\_\_\_\_

For Notary \$ \_\_\_\_\_

State of \_\_\_\_\_

Total Fees \$ \_\_\_\_\_

By \_\_\_\_\_

(Must be verified if served outside the State of Texas)

State of \_\_\_\_\_

County of \_\_\_\_\_

Signed and sworn to me by the said \_\_\_\_\_ before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, to certify which witness my hand and seal of office.

Seal

State & County of \_\_\_\_\_

**FORM NO. 3534 CITATION**

**THE STATE OF TEXAS**

**To:** L'OREAL USA, INC.  
BY SERVING THE SECRETARY OF STATE  
OFFICE OF THE SECRETARY OF STATE  
CITATIONS UNIT - P.O. BOX 12079  
AUSTIN, TX, 78711

**GREETINGS:**

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **160th District Court** at 600 Commerce Street, Dallas Texas, 75202.

Said **PLAINTIFF** being **ALVARO ALVARADO AND MARIA LLANES**

Filed in said Court on the **16th day of June, 2021** against

AVENTIS INC., BAYER CONSUMER CARE HOLDINGS LLC F/K/A BAYER CONSUMER CARE LLC F/K/A MSD CONSUMER CARE, INC., BAYER HEALTHCARE LLC, A SUBSIDIARY OF BAYER AG, BRENNTAG NORTH AMERICA, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO MINERAL PIGMENT SOLUTIONS, INC. AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), BRENNTAG SPECIALTIES, LLC F/K/A BRENNTAG SPECIALTIES, INC. F/K/A MINERAL PIGMENT SOLUTIONS, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), CLINIQUE LABORATORIES, INC., A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., CLINIQUE LABORATORIES, LLC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., COLOR TECHNIQUES, INC., COSMETIC SPECIALTIES, INC. (SUED INDIVIDUALLY AND FORMERLY D/B/A G&G SPECIALTY PRODUCTS CO.), CROWN LABORATORIES, INC, DR. SCHOLL'S LLC, ESTEE LAUDER, INC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES, INC, THE ESTEE LAUDER COMPANIES, INC. (SUED INDIVIDUALLY AND FOR LEN-RON MANUFACTURING CO. INC.), FIESTA MART, L.L.C., FISONS CORPORATION, GSK CONSUMER HEALTH, INC. F/K/A NOVARTIS CONSUMER HEALTH INC. F/K/A CIBA SELF-MEDICATION, INC. L'OREAL USA, INC., MAYBELLINE LLC, MERCK & CO., INC., NOVARTIS CORPORATION (SUED INDIVIDUALLY AND AS A SUCCESSOR-IN-INTEREST TO CIBA-GEIGY CORPORATION AND ITS SUBSIDIARIES CIBA CONSUMER PHARMACEUTICALS AND CIBA SELF-MEDICATION, INC.), PFIZER INC., PRESPERSE CORPORATION, PRESPERSE INTERNATIONAL CORP, PTI UNION, LLC A/K/A PHARMA TECH INDUSTRIES, REVOLON CONSUMER PRODUCTS CORPORATION, SANOFI-AVENTIS U.S. LLC (SUED INDIVIDUALLY AND AS SUCCESSOR BY MERGER TO AVENTIS PHARMACEUTICALS INC.), SCHOLL'S WELLNESS COMPANY LLC, SPECIALTY MINERALS INC., (SUED INDIVIDUALLY AND AS A SUBSIDIARY OF MINERALS TECHNOLOGIES INC.), WHITTAKER CLARK & DANIELS, INC.

For suit, said suit being numbered **DC-21-07664** the nature of which demand is as follows: **Suit On OTHER (CIVIL) etc.**

as shown on said petition a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

**WITNESS:** FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office on **this the 18th day of June, 2021**

ATTEST: FELICIA PITRE Clerk of the District Courts of Dallas, County, Texas

By



KARI MALONE

, Deputy



**ESERVE (SOS)**

**CITATION**

No.: **DC-21-07664**

**ALVARO ALVARADO, et al**

**vs.**

**AVENTIS INC., et al**

**ISSUED  
ON THIS THE 18TH DAY  
OF JUNE, 2021**

FELICIA PITRE  
Clerk District Courts,  
Dallas County, Texas

By **KARI MALONE**, Deputy

Attorney for : Plaintiff  
**JENNIFER MONTEMAYOR**  
1201 Elm Street, Suite 3400  
Dallas, Texas 75270  
214-276-7680  
**jmontemayor@sgptrial.com**

**DALLAS COUNTY  
SERVICE FEES  
NOT PAID**

**OFFICER'S RETURN  
FOR INDIVIDUALS**

Cause No. DC-21-07664  
Court No: 160th District Court

Style: ALVARO ALVARADO, et al  
vs.  
AVENTIS INC., et al

Received this Citation the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock. Executed at \_\_\_\_\_, within the County of \_\_\_\_\_, State of \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock, by \_\_\_\_\_ delivering to the within named \_\_\_\_\_ each in person, a copy of this Citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

-----000000-----  
**OFFICER'S RETURN  
FOR CORPORATIONS**

Received this Citation the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_M. Executed at \_\_\_\_\_, within the County of \_\_\_\_\_, State of \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock \_\_\_\_M. by summoning the within named Corporation, \_\_\_\_\_

President - Vice President - Registered Agent - in person, of the said

a true copy of this citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

-----000000-----

The distance actually traveled by me in serving such process was \_\_\_\_\_ miles and my fees are as follows: To certify which witness by my hand.

For Serving Citation \$ \_\_\_\_\_

Sheriff \_\_\_\_\_

For Mileage \$ \_\_\_\_\_

County of \_\_\_\_\_

For Notary \$ \_\_\_\_\_

State of \_\_\_\_\_

Total Fees \$ \_\_\_\_\_

By \_\_\_\_\_

(Must be verified if served outside the State of Texas)

State of \_\_\_\_\_

County of \_\_\_\_\_

Signed and sworn to me by the said \_\_\_\_\_ before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, to certify which witness my hand and seal of office.

Seal

State & County of \_\_\_\_\_

**FORM NO. 3534 CITATION**

**THE STATE OF TEXAS**

**To:** MAYBELLINE LLC  
BY SERVING THE SECRETARY OF STATE  
OFFICE OF THE SECRETARY OF STATE  
CITATIONS UNIT - P.O. BOX 12079  
AUSTIN, TX, 78711

**GREETINGS:**

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **160th District Court** at 600 Commerce Street, Dallas Texas, 75202.

Said **PLAINTIFF** being ALVARO ALVARADO AND MARIA LLANES

Filed in said Court on the **16th day of June, 2021** against

AVENTIS INC., BAYER CONSUMER CARE HOLDINGS LLC F/K/A BAYER CONSUMER CARE LLC F/K/A MSD CONSUMER CARE, INC., BAYER HEALTHCARE LLC, A SUBSIDIARY OF BAYER AG, BRENNTAG NORTH AMERICA, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO MINERAL PIGMENT SOLUTIONS, INC. AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), BRENNTAG SPECIALTIES, LLC F/K/A BRENNTAG SPECIALTIES, INC. F/K/A MINERAL PIGMENT SOLUTIONS, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), CLINIQUÉ LABORATORIES, INC., A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., CLINIQUÉ LABORATORIES, LLC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., COLOR TECHNIQUES, INC., COSMETIC SPECIALTIES, INC. (SUED INDIVIDUALLY AND FORMERLY D/B/A G&G SPECIALTY PRODUCTS CO.), CROWN LABORATORIES, INC, DR. SCHOLL'S LLC, ESTEE LAUDER, INC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES, INC, THE ESTEE LAUDER COMPANIES, INC. (SUED INDIVIDUALLY AND FOR LEN-RON MANUFACTURING CO. INC.), FIESTA MART, L.L.C., FISONS CORPORATION, GSK CONSUMER HEALTH, INC. F/K/A NOVARTIS CONSUMER HEALTH INC. F/K/A CIBA SELF-MEDICATION, INC. L'OREAL USA, INC., MAYBELLINE LLC, MERCK & CO., INC., NOVARTIS CORPORATION (SUED INDIVIDUALLY AND AS A SUCCESSOR-IN-INTEREST TO CIBA-GEIGY CORPORATION AND ITS SUBSIDIARIES CIBA CONSUMER PHARMACEUTICALS AND CIBA SELF-MEDICATION, INC.), PFIZER INC., PRESPERSE CORPORATION, PRESPERSE INTERNATIONAL CORP, PTI UNION, LLC A/K/A PHARMA TECH INDUSTRIES, REVOLON CONSUMER PRODUCTS CORPORATION, SANOFI-AVENTIS U.S. LLC (SUED INDIVIDUALLY AND AS SUCCESSOR BY MERGER TO AVENTIS PHARMACEUTICALS INC.), SCHOLL'S WELLNESS COMPANY LLC, SPECIALTY MINERALS INC., (SUED INDIVIDUALLY AND AS A SUBSIDIARY OF MINERALS TECHNOLOGIES INC.), WHITTAKER CLARK & DANIELS, INC.

For suit, said suit being numbered **DC-21-07664** the nature of which demand is as follows: **Suit On OTHER (CIVIL) etc.**

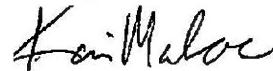
as shown on said petition a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

**WITNESS:** FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office on **this the 18th day of June, 2021**

ATTEST: FELICIA PITRE Clerk of the District Courts of Dallas, County, Texas

By



KARI MALONE

, Deputy



**ESERVE (SOS)**

**CITATION**

No.: **DC-21-07664**

**ALVARO ALVARADO, et al**

**vs.**

**AVENTIS INC., et al**

**ISSUED  
ON THIS THE 18TH DAY  
OF JUNE, 2021**

FELICIA PITRE  
Clerk District Courts,  
Dallas County, Texas

By **KARI MALONE**, Deputy

Attorney for : Plaintiff  
**JENNIFER MONTEMAYOR**  
1201 Elm Street, Suite 3400  
Dallas, Texas 75270  
214-276-7680  
**jmontemayor@sgptrial.com**

**DALLAS COUNTY  
SERVICE FEES  
NOT PAID**

**OFFICER'S RETURN  
FOR INDIVIDUALS**

Cause No. DC-21-07664  
Court No: 160th District Court

Style: ALVARO ALVARADO, et al  
vs.  
AVENTIS INC., et al

Received this Citation the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock. Executed at \_\_\_\_\_, within the County of \_\_\_\_\_, State of \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock, by \_\_\_\_\_ delivering to the within named \_\_\_\_\_ each in person, a copy of this Citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

-----000000-----  
**OFFICER'S RETURN  
FOR CORPORATIONS**

Received this Citation the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_M. Executed at \_\_\_\_\_, within the County of \_\_\_\_\_, State of \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock \_\_\_\_M. by summoning the within named Corporation, \_\_\_\_\_

President - Vice President - Registered Agent - in person, of the said

a true copy of this citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

-----000000-----

The distance actually traveled by me in serving such process was \_\_\_\_\_ miles and my fees are as follows: To certify which witness by my hand.

For Serving Citation \$ \_\_\_\_\_

Sheriff \_\_\_\_\_

For Mileage \$ \_\_\_\_\_

County of \_\_\_\_\_

For Notary \$ \_\_\_\_\_

State of \_\_\_\_\_

Total Fees \$ \_\_\_\_\_

By \_\_\_\_\_

(Must be verified if served outside the State of Texas)

State of \_\_\_\_\_

County of \_\_\_\_\_

Signed and sworn to me by the said \_\_\_\_\_ before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, to certify which witness my hand and seal of office.

Seal

State & County of \_\_\_\_\_

**FORM NO. 3534 CITATION**

**THE STATE OF TEXAS**

**To:** NOVARTIS CORPORATION (SUED INDIVIDUALLY AND AS A SUCCESSOR-IN-INTEREST TO CIBA-GEIGY CORPORATION AND ITS SUBSIDIARIES CIBA CONSUMER PHARMACEUTICALS AND CIBA SELF-MEDICATION, INC.)  
BY SERVING THE SECRETARY OF STATE  
OFFICE OF THE SECRETARY OF STATE  
CITATIONS UNIT - P.O. BOX 12079  
AUSTIN, TX, 78711

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **160th District Court** at 600 Commerce Street, Dallas Texas, 75202.

Said PLAINTIFF being ALVARO ALVARADO AND MARIA LLANES

Filed in said Court on the **16th day of June, 2021** against

AVENTIS INC., BAYER CONSUMER CARE HOLDINGS LLC F/K/A BAYER CONSUMER CARE LLC F/K/A MSD CONSUMER CARE, INC., BAYER HEALTHCARE LLC, A SUBSIDIARY OF BAYER AG, BRENNTAG NORTH AMERICA, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO MINERAL PIGMENT SOLUTIONS, INC. AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), BRENNTAG SPECIALTIES, LLC F/K/A BRENNTAG SPECIALTIES, INC. F/K/A MINERAL PIGMENT SOLUTIONS, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), CLINIQUE LABORATORIES, INC., A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., CLINIQUE LABORATORIES, LLC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., COLOR TECHNIQUES, INC, COSMETIC SPECIALTIES, INC. (SUED INDIVIDUALLY AND FORMERLY D/B/A G&G SPECIALTY PRODUCTS CO.), CROWN LABORATORIES, INC, DR. SCHOLL'S LLC, ESTEE LAUDER, INC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES, INC, THE ESTEE LAUDER COMPANIES, INC. (SUED INDIVIDUALLY AND FOR LEN-RON MANUFACTURING CO. INC.), FIESTA MART, L.L.C., FISONS CORPORATION, GSK CONSUMER HEALTH, INC. F/K/A NOVARTIS CONSUMER HEALTH INC. F/K/A CIBA SELF-MEDICATION, INC. L'OREAL USA, INC., MAYBELLINE LLC, MERCK & CO., INC., NOVARTIS CORPORATION (SUED INDIVIDUALLY AND AS A SUCCESSOR-IN-INTEREST TO CIBA-GEIGY CORPORATION AND ITS SUBSIDIARIES CIBA CONSUMER PHARMACEUTICALS AND CIBA SELF-MEDICATION, INC.), PFIZER INC., PRESPERSE CORPORATION, PRESPERSE INTERNATIONAL CORP, PTI UNION, LLC A/K/A PHARMA TECH INDUSTRIES, REVOLIN CONSUMER PRODUCTS CORPORATION, SANOFI-AVENTIS U.S. LLC (SUED INDIVIDUALLY AND AS SUCCESSOR BY MERGER TO AVENTIS PHARMACEUTICALS INC.), SCHOLL'S WELLNESS COMPANY LLC, SPECIALTY MINERALS INC., (SUED INDIVIDUALLY AND AS A SUBSIDIARY OF MINERALS TECHNOLOGIES INC.), WHITTAKER CLARK & DANIELS, INC.

For suit, said suit being numbered **DC-21-07664** the nature of which demand is as follows: **Suit On OTHER (CIVIL) etc.**

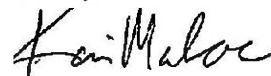
as shown on said petition a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office on this the 18th day of June, 2021

ATTEST: FELICIA PITRE Clerk of the District Courts of Dallas, County, Texas

By



KARI MALONE

, Deputy



**ESERVE (SOS)**

**CITATION**

No.: **DC-21-07664**

**ALVARO ALVARADO, et al**  
vs.  
**AVENTIS INC., et al**

**ISSUED**  
**ON THIS THE 18TH DAY**  
**OF JUNE, 2021**

FELICIA PITRE  
Clerk District Courts,  
Dallas County, Texas

By **KARI MALONE**, Deputy

Attorney for : Plaintiff  
**JENNIFER MONTEMAYOR**  
1201 Elm Street, Suite 3400  
Dallas, Texas 75270  
214-276-7680  
**jmontemayor@sgptrial.com**

**DALLAS COUNTY**  
**SERVICE FEES**  
**NOT PAID**

**OFFICER'S RETURN  
FOR INDIVIDUALS**

Cause No. DC-21-07664  
Court No: 160th District Court

Style: ALVARO ALVARADO, et al  
vs.  
AVENTIS INC., et al

Received this Citation the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock. Executed at \_\_\_\_\_, within the County of \_\_\_\_\_, State of \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock, by \_\_\_\_\_ delivering to the within named \_\_\_\_\_ each in person, a copy of this Citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

-----000000-----  
**OFFICER'S RETURN  
FOR CORPORATIONS**

Received this Citation the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_M. Executed at \_\_\_\_\_, within the County of \_\_\_\_\_, State of \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock \_\_\_\_M. by summoning the within named Corporation, \_\_\_\_\_

President - Vice President - Registered Agent - in person, of the said

a true copy of this citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

-----000000-----

The distance actually traveled by me in serving such process was \_\_\_\_\_ miles and my fees are as follows: To certify which witness by my hand.

For Serving Citation \$ \_\_\_\_\_

Sheriff \_\_\_\_\_

For Mileage \$ \_\_\_\_\_

County of \_\_\_\_\_

For Notary \$ \_\_\_\_\_

State of \_\_\_\_\_

Total Fees \$ \_\_\_\_\_

By \_\_\_\_\_

(Must be verified if served outside the State of Texas)

State of \_\_\_\_\_

County of \_\_\_\_\_

Signed and sworn to me by the said \_\_\_\_\_ before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, to certify which witness my hand and seal of office.

Seal

State & County of \_\_\_\_\_

**FORM NO. 3534 CITATION**

**THE STATE OF TEXAS**

**To:** PRESPERSE CORPORATION  
BY SERVING THE SECRETARY OF STATE  
OFFICE OF THE SECRETARY OF STATE  
CITATIONS UNIT - P.O. BOX 12079  
AUSTIN, TX, 78711

**GREETINGS:**

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **160th District Court** at 600 Commerce Street, Dallas Texas, 75202.

Said **PLAINTIFF** being ALVARO ALVARADO AND MARIA LLANES

Filed in said Court on the **16th day of June, 2021** against

AVENTIS INC., BAYER CONSUMER CARE HOLDINGS LLC F/K/A BAYER CONSUMER CARE LLC F/K/A MSD CONSUMER CARE, INC., BAYER HEALTHCARE LLC, A SUBSIDIARY OF BAYER AG, BRENNAG NORTH AMERICA, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO MINERAL PIGMENT SOLUTIONS, INC. AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), BRENNAG SPECIALTIES, LLC F/K/A BRENNAG SPECIALTIES, INC. F/K/A MINERAL PIGMENT SOLUTIONS, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), CLINIQUÉ LABORATORIES, INC., A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., CLINIQUÉ LABORATORIES, LLC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., COLOR TECHNIQUES, INC., COSMETIC SPECIALTIES, INC. (SUED INDIVIDUALLY AND FORMERLY D/B/A G&G SPECIALTY PRODUCTS CO.), CROWN LABORATORIES, INC, DR. SCHOLL'S LLC, ESTEE LAUDER, INC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES, INC, THE ESTEE LAUDER COMPANIES, INC. (SUED INDIVIDUALLY AND FOR LEN-RON MANUFACTURING CO. INC.), FIESTA MART, L.L.C., FISONS CORPORATION, GSK CONSUMER HEALTH, INC. F/K/A NOVARTIS CONSUMER HEALTH INC. F/K/A CIBA SELF-MEDICATION, INC. L'OREAL USA, INC., MAYBELLINE LLC, MERCK & CO., INC., NOVARTIS CORPORATION (SUED INDIVIDUALLY AND AS A SUCCESSOR-IN-INTEREST TO CIBA-GEIGY CORPORATION AND ITS SUBSIDIARIES CIBA CONSUMER PHARMACEUTICALS AND CIBA SELF-MEDICATION, INC.), PFIZER INC., PRESUPERSE CORPORATION, PRESUPERSE INTERNATIONAL CORP, PTI UNION, LLC A/K/A PHARMA TECH INDUSTRIES, REVOLON CONSUMER PRODUCTS CORPORATION, SANOFI-AVENTIS U.S. LLC (SUED INDIVIDUALLY AND AS SUCCESSOR BY MERGER TO AVENITIS PHARMACEUTICALS INC.), SCHOLL'S WELLNESS COMPANY LLC, SPECIALTY MINERALS INC., (SUED INDIVIDUALLY AND AS A SUBSIDIARY OF MINERALS TECHNOLOGIES INC.), WHITTAKER CLARK & DANIELS, INC.

For suit, said suit being numbered **DC-21-07664** the nature of which demand is as follows: **Suit On OTHER (CIVIL) etc.**

as shown on said petition a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

**WITNESS:** FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office on **this the 18th day of June, 2021**

ATTEST: FELICIA PITRE Clerk of the District Courts of Dallas, County, Texas

By Kari Malone, Deputy

KARI MALONE



**ESERVE (SOS)**

**CITATION**

No.: **DC-21-07664**

**ALVARO ALVARADO, et al**

**vs.**

**AVENTIS INC., et al**

**ISSUED  
ON THIS THE 18TH DAY  
OF JUNE, 2021**

FELICIA PITRE  
Clerk District Courts,  
Dallas County, Texas

By **KARI MALONE**, Deputy

Attorney for : Plaintiff  
**JENNIFER MONTEMAYOR**  
1201 Elm Street, Suite 3400  
Dallas, Texas 75270  
214-276-7680  
**jmontemayor@sgptrial.com**

**DALLAS COUNTY  
SERVICE FEES  
NOT PAID**

**OFFICER'S RETURN  
FOR INDIVIDUALS**

Cause No. DC-21-07664  
Court No: 160th District Court

Style: ALVARO ALVARADO, et al  
vs.  
AVENTIS INC., et al

Received this Citation the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock. Executed at \_\_\_\_\_, within the County of \_\_\_\_\_, State of \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock, by \_\_\_\_\_ delivering to the within named \_\_\_\_\_ each in person, a copy of this Citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

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**OFFICER'S RETURN  
FOR CORPORATIONS**

Received this Citation the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_M. Executed at \_\_\_\_\_, within the County of \_\_\_\_\_, State of \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock \_\_\_\_M. by summoning the within named Corporation, \_\_\_\_\_

President - Vice President - Registered Agent - in person, of the said

a true copy of this citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

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The distance actually traveled by me in serving such process was \_\_\_\_\_ miles and my fees are as follows: To certify which witness by my hand.

For Serving Citation \$ \_\_\_\_\_

Sheriff \_\_\_\_\_

For Mileage \$ \_\_\_\_\_

County of \_\_\_\_\_

For Notary \$ \_\_\_\_\_

State of \_\_\_\_\_

Total Fees \$ \_\_\_\_\_

By \_\_\_\_\_

(Must be verified if served outside the State of Texas)

State of \_\_\_\_\_

County of \_\_\_\_\_

Signed and sworn to me by the said \_\_\_\_\_ before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, to certify which witness my hand and seal of office.

Seal

State & County of \_\_\_\_\_

**FORM NO. 3534 CITATION**

**THE STATE OF TEXAS**

**To:** PRESPERSE INTERNATIONAL CORP  
BY SERVING THE SECRETARY OF STATE  
OFFICE OF THE SECRETARY OF STATE  
CITATIONS UNIT - P.O. BOX 12079  
AUSTIN, TX, 78711

**GREETINGS:**

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **160th District Court** at 600 Commerce Street, Dallas Texas, 75202.

Said **PLAINTIFF** being **ALVARO ALVARADO AND MARIA LLANES**

Filed in said Court on the **16th day of June, 2021** against

AVENTIS INC., BAYER CONSUMER CARE HOLDINGS LLC F/K/A BAYER CONSUMER CARE LLC F/K/A MSD CONSUMER CARE, INC., BAYER HEALTHCARE LLC, A SUBSIDIARY OF BAYER AG, BRENNTAG NORTH AMERICA, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO MINERAL PIGMENT SOLUTIONS, INC. AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), BRENNTAG SPECIALTIES, LLC F/K/A BRENNTAG SPECIALTIES, INC. F/K/A MINERAL PIGMENT SOLUTIONS, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), CLINIQUÉ LABORATORIES, INC., A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., CLINIQUÉ LABORATORIES, LLC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., COLOR TECHNIQUES, INC., COSMETIC SPECIALTIES, INC. (SUED INDIVIDUALLY AND FORMERLY D/B/A G&G SPECIALTY PRODUCTS CO.), CROWN LABORATORIES, INC, DR. SCHOLL'S LLC, ESTEE LAUDER, INC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES, INC, THE ESTEE LAUDER COMPANIES, INC. (SUED INDIVIDUALLY AND FOR LEN-RON MANUFACTURING CO. INC.), FIESTA MART, L.L.C., FISONS CORPORATION, GSK CONSUMER HEALTH, INC. F/K/A NOVARTIS CONSUMER HEALTH INC. F/K/A CIBA SELF-MEDICATION, INC. L'OREAL USA, INC., MAYBELLINE LLC, MERCK & CO., INC., NOVARTIS CORPORATION (SUED INDIVIDUALLY AND AS A SUCCESSOR-IN-INTEREST TO CIBA-GEIGY CORPORATION AND ITS SUBSIDIARIES CIBA CONSUMER PHARMACEUTICALS AND CIBA SELF-MEDICATION, INC.), PFIZER INC., PRESPERSE CORPORATION, PRESPERSE INTERNATIONAL CORP, PTI UNION, LLC A/K/A PHARMA TECH INDUSTRIES, REVOLON CONSUMER PRODUCTS CORPORATION, SANOFI-AVENTIS U.S. LLC (SUED INDIVIDUALLY AND AS SUCCESSOR BY MERGER TO AVENTIS PHARMACEUTICALS INC.), SCHOLL'S WELLNESS COMPANY LLC, SPECIALTY MINERALS INC., (SUED INDIVIDUALLY AND AS A SUBSIDIARY OF MINERALS TECHNOLOGIES INC.), WHITTAKER CLARK & DANIELS, INC.

For suit, said suit being numbered **DC-21-07664** the nature of which demand is as follows: **Suit On OTHER (CIVIL) etc.**

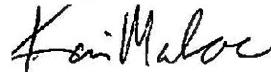
as shown on said petition a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

**WITNESS:** FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office on **this the 18th day of June, 2021**

ATTEST: FELICIA PITRE Clerk of the District Courts of Dallas, County, Texas

By



KARI MALONE

, Deputy



**ESERVE (SOS)**

**CITATION**

No.: **DC-21-07664**

**ALVARO ALVARADO, et al**

**vs.**

**AVENTIS INC., et al**

**ISSUED  
ON THIS THE 18TH DAY  
OF JUNE, 2021**

FELICIA PITRE  
Clerk District Courts,  
Dallas County, Texas

By **KARI MALONE**, Deputy

Attorney for : Plaintiff  
**JENNIFER MONTEMAYOR**  
1201 Elm Street, Suite 3400  
Dallas, Texas 75270  
214-276-7680  
**jmontemayor@sgptrial.com**

**DALLAS COUNTY  
SERVICE FEES  
NOT PAID**

**OFFICER'S RETURN  
FOR INDIVIDUALS**

Cause No. DC-21-07664  
Court No: 160th District Court

Style: ALVARO ALVARADO, et al  
vs.  
AVENTIS INC., et al

Received this Citation the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock. Executed at \_\_\_\_\_, within the County of \_\_\_\_\_, State of \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock, by \_\_\_\_\_ delivering to the within named \_\_\_\_\_ each in person, a copy of this Citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

-----000000-----  
**OFFICER'S RETURN  
FOR CORPORATIONS**

Received this Citation the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_M. Executed at \_\_\_\_\_, within the County of \_\_\_\_\_, State of \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock \_\_\_\_M. by summoning the within named Corporation, \_\_\_\_\_

President - Vice President - Registered Agent - in person, of the said

a true copy of this citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

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The distance actually traveled by me in serving such process was \_\_\_\_\_ miles and my fees are as follows: To certify which witness by my hand.

For Serving Citation \$ \_\_\_\_\_

Sheriff \_\_\_\_\_

For Mileage \$ \_\_\_\_\_

County of \_\_\_\_\_

For Notary \$ \_\_\_\_\_

State of \_\_\_\_\_

Total Fees \$ \_\_\_\_\_

By \_\_\_\_\_

(Must be verified if served outside the State of Texas)

State of \_\_\_\_\_

County of \_\_\_\_\_

Signed and sworn to me by the said \_\_\_\_\_ before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, to certify which witness my hand and seal of office.

Seal

State & County of \_\_\_\_\_

**FORM NO. 3534 CITATION**

**THE STATE OF TEXAS**

**To:** PTI UNION, LLC A/K/A PHARMA TECH INDUSTRIES  
BY SERVING THE SECRETARY OF STATE  
OFFICE OF THE SECRETARY OF STATE  
CITATIONS UNIT - P.O. BOX 12079  
AUSTIN, TX, 78711

**GREETINGS:**

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **160th District Court** at 600 Commerce Street, Dallas Texas, 75202.

Said **PLAINTIFF** being ALVARO ALVARADO AND MARIA LLANES

Filed in said Court on the **16th day of June, 2021** against

AVENTIS INC., BAYER CONSUMER CARE HOLDINGS LLC F/K/A BAYER CONSUMER CARE LLC F/K/A MSD CONSUMER CARE, INC., BAYER HEALTHCARE LLC, A SUBSIDIARY OF BAYER AG, BRENNTAG NORTH AMERICA, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO MINERAL PIGMENT SOLUTIONS, INC. AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), BRENNTAG SPECIALTIES, LLC F/K/A BRENNTAG SPECIALTIES, INC. F/K/A MINERAL PIGMENT SOLUTIONS, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), CLINIQUÉ LABORATORIES, INC., A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., CLINIQUÉ LABORATORIES, LLC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., COLOR TECHNIQUES, INC., COSMETIC SPECIALTIES, INC. (SUED INDIVIDUALLY AND FORMERLY D/B/A G&G SPECIALTY PRODUCTS CO.), CROWN LABORATORIES, INC, DR. SCHOLL'S LLC, ESTEE LAUDER, INC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES, INC, THE ESTEE LAUDER COMPANIES, INC. (SUED INDIVIDUALLY AND FOR LEN-RON MANUFACTURING CO. INC.), FIESTA MART, L.L.C., FISONS CORPORATION, GSK CONSUMER HEALTH, INC. F/K/A NOVARTIS CONSUMER HEALTH INC. F/K/A CIBA SELF-MEDICATION, INC. L'OREAL USA, INC., MAYBELLINE LLC, MERCK & CO., INC., NOVARTIS CORPORATION (SUED INDIVIDUALLY AND AS A SUCCESSOR-IN-INTEREST TO CIBA-GEIGY CORPORATION AND ITS SUBSIDIARIES CIBA CONSUMER PHARMACEUTICALS AND CIBA SELF-MEDICATION, INC.), PFIZER INC., PRESPERSE CORPORATION, PRESPERSE INTERNATIONAL CORP, PTI UNION, LLC A/K/A PHARMA TECH INDUSTRIES, REVOLON CONSUMER PRODUCTS CORPORATION, SANOFI-AVENTIS U.S. LLC (SUED INDIVIDUALLY AND AS SUCCESSOR BY MERGER TO AVENTIS PHARMACEUTICALS INC.), SCHOLL'S WELLNESS COMPANY LLC, SPECIALTY MINERALS INC., (SUED INDIVIDUALLY AND AS A SUBSIDIARY OF MINERALS TECHNOLOGIES INC.), WHITTAKER CLARK & DANIELS, INC.

For suit, said suit being numbered **DC-21-07664** the nature of which demand is as follows: **Suit On OTHER (CIVIL) etc.**

as shown on said petition a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

**WITNESS:** FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office on **this the 18th day of June, 2021**

ATTEST: FELICIA PITRE Clerk of the District Courts of Dallas, County, Texas

By



KARI MALONE

, Deputy



**ESERVE (SOS)**

**CITATION**

No.: **DC-21-07664**

**ALVARO ALVARADO, et al**

vs.

**AVENTIS INC., et al**

**ISSUED  
ON THIS THE 18TH DAY  
OF JUNE, 2021**

FELICIA PITRE  
Clerk District Courts,  
Dallas County, Texas

By **KARI MALONE**, Deputy

Attorney for : Plaintiff  
**JENNIFER MONTEMAYOR**  
1201 Elm Street, Suite 3400  
Dallas, Texas 75270  
214-276-7680  
[jmontemayor@sgptrial1.com](mailto:jmontemayor@sgptrial1.com)

**DALLAS COUNTY  
SERVICE FEES  
NOT PAID**

**OFFICER'S RETURN  
FOR INDIVIDUALS**

Cause No. DC-21-07664  
Court No: 160th District Court

Style: ALVARO ALVARADO, et al  
vs.  
AVENTIS INC., et al

Received this Citation the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock. Executed at \_\_\_\_\_, within the County of \_\_\_\_\_, State of \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock, by \_\_\_\_\_ delivering to the within named \_\_\_\_\_ each in person, a copy of this Citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

-----000000-----  
**OFFICER'S RETURN  
FOR CORPORATIONS**

Received this Citation the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_M. Executed at \_\_\_\_\_, within the County of \_\_\_\_\_, State of \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock \_\_\_\_M. by summoning the within named Corporation, \_\_\_\_\_

President - Vice President - Registered Agent - in person, of the said

a true copy of this citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

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The distance actually traveled by me in serving such process was \_\_\_\_\_ miles and my fees are as follows: To certify which witness by my hand.

For Serving Citation \$ \_\_\_\_\_

Sheriff \_\_\_\_\_

For Mileage \$ \_\_\_\_\_

County of \_\_\_\_\_

For Notary \$ \_\_\_\_\_

State of \_\_\_\_\_

Total Fees \$ \_\_\_\_\_

By \_\_\_\_\_

(Must be verified if served outside the State of Texas)

State of \_\_\_\_\_

County of \_\_\_\_\_

Signed and sworn to me by the said \_\_\_\_\_ before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, to certify which witness my hand and seal of office.

Seal

State & County of \_\_\_\_\_

**FORM NO. 3534 CITATION**

**THE STATE OF TEXAS**

**To:** REVOLN CONSUMER PRODUCTS CORPORATION  
BY SERVING THE SECRETARY OF STATE  
OFFICE OF THE SECRETARY OF STATE  
CITATIONS UNIT - P.O. BOX 12079  
AUSTIN, TX, 78711

**GREETINGS:**

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **160th District Court** at 600 Commerce Street, Dallas Texas, 75202.

Said **PLAINTIFF** being **ALVARO ALVARADO AND MARIA LLANES**

Filed in said Court on the **16th day of June, 2021** against

AVENTIS INC., BAYER CONSUMER CARE HOLDINGS LLC F/K/A BAYER CONSUMER CARE LLC F/K/A MSD CONSUMER CARE, INC., BAYER HEALTHCARE LLC, A SUBSIDIARY OF BAYER AG, BRENNTAG NORTH AMERICA, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO MINERAL PIGMENT SOLUTIONS, INC. AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), BRENNTAG SPECIALTIES, LLC F/K/A BRENNTAG SPECIALTIES, INC. F/K/A MINERAL PIGMENT SOLUTIONS, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), CLINIQUÉ LABORATORIES, INC., A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., CLINIQUÉ LABORATORIES, LLC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., COLOR TECHNIQUES, INC., COSMETIC SPECIALTIES, INC. (SUED INDIVIDUALLY AND FORMERLY D/B/A G&G SPECIALTY PRODUCTS CO.), CROWN LABORATORIES, INC, DR. SCHOLL'S LLC, ESTEE LAUDER, INC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES, INC, THE ESTEE LAUDER COMPANIES, INC. (SUED INDIVIDUALLY AND FOR LEN-RON MANUFACTURING CO. INC.), FIESTA MART, L.L.C., FISONS CORPORATION, GSK CONSUMER HEALTH, INC. F/K/A NOVARTIS CONSUMER HEALTH INC. F/K/A CIBA SELF-MEDICATION, INC. L'OREAL USA, INC., MAYBELLINE LLC, MERCK & CO., INC., NOVARTIS CORPORATION (SUED INDIVIDUALLY AND AS A SUCCESSOR-IN-INTEREST TO CIBA-GEIGY CORPORATION AND ITS SUBSIDIARIES CIBA CONSUMER PHARMACEUTICALS AND CIBA SELF-MEDICATION, INC.), PFIZER INC., PRESPERSE CORPORATION, PRESPERSE INTERNATIONAL CORP, PTI UNION, LLC A/K/A PHARMA TECH INDUSTRIES, REVOLN CONSUMER PRODUCTS CORPORATION, SANOFI-AVENTIS U.S. LLC (SUED INDIVIDUALLY AND AS SUCCESSOR BY MERGER TO AVENTIS PHARMACEUTICALS INC.), SCHOLL'S WELLNESS COMPANY LLC, SPECIALTY MINERALS INC., (SUED INDIVIDUALLY AND AS A SUBSIDIARY OF MINERALS TECHNOLOGIES INC.), WHITTAKER CLARK & DANIELS, INC.

For suit, said suit being numbered **DC-21-07664** the nature of which demand is as follows: **Suit On OTHER (CIVIL) etc.**

as shown on said petition a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

**WITNESS:** FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office on **this the 18th day of June, 2021**

ATTEST: FELICIA PITRE Clerk of the District Courts of Dallas, County, Texas

By



KARI MALONE

, Deputy



**ESERVE (SOS)**

**CITATION**

No.: **DC-21-07664**

**ALVARO ALVARADO, et al**

**vs.**

**AVENTIS INC., et al**

**ISSUED  
ON THIS THE 18TH DAY  
OF JUNE, 2021**

FELICIA PITRE  
Clerk District Courts,  
Dallas County, Texas

By **KARI MALONE**, Deputy

Attorney for : Plaintiff  
**JENNIFER MONTEMAYOR**  
1201 Elm Street, Suite 3400  
Dallas, Texas 75270  
214-276-7680  
[jmontemayor@sgptrial1.com](mailto:jmontemayor@sgptrial1.com)

**DALLAS COUNTY  
SERVICE FEES  
NOT PAID**

**OFFICER'S RETURN  
FOR INDIVIDUALS**

Cause No. DC-21-07664

Court No: 160th District Court

Style: ALVARO ALVARADO, et al

vs.

AVENTIS INC., et al

Received this Citation the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock. Executed at \_\_\_\_\_, within the County of \_\_\_\_\_, State of \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock, by \_\_\_\_\_ delivering to the within named \_\_\_\_\_ each in person, a copy of this Citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

-----000000-----  
**OFFICER'S RETURN  
FOR CORPORATIONS**

Received this Citation the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_M. Executed at \_\_\_\_\_, within the County of \_\_\_\_\_, State of \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock \_\_\_\_M. by summoning the within named Corporation, \_\_\_\_\_

President - Vice President - Registered Agent - in person, of the said

a true copy of this citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

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The distance actually traveled by me in serving such process was \_\_\_\_\_ miles and my fees are as follows: To certify which witness by my hand.

For Serving Citation \$ \_\_\_\_\_

Sheriff \_\_\_\_\_

For Mileage \$ \_\_\_\_\_

County of \_\_\_\_\_

For Notary \$ \_\_\_\_\_

State of \_\_\_\_\_

Total Fees \$ \_\_\_\_\_

By \_\_\_\_\_

(Must be verified if served outside the State of Texas)

State of \_\_\_\_\_

County of \_\_\_\_\_

Signed and sworn to me by the said \_\_\_\_\_ before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, to certify which witness my hand and seal of office.

Seal

State & County of \_\_\_\_\_

**FORM NO. 3534 CITATION**

**THE STATE OF TEXAS**

**To:** SANOFI-AVENTIS U.S. LLC (SUED INDIVIDUALLY AND AS SUCCESSOR BY MERGER TO AVENTIS PHARMACEUTICALS INC.)  
BY SERVING THE SECRETARY OF STATE  
OFFICE OF THE SECRETARY OF STATE  
CITATIONS UNIT - P.O. BOX 12079  
AUSTIN, TX, 78711

**GREETINGS:**

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **160th District Court** at 600 Commerce Street, Dallas Texas, 75202.

Said **PLAINTIFF** being ALVARO ALVARADO AND MARIA LLANES

Filed in said Court on the **16th day of June, 2021** against

AVENTIS INC., BAYER CONSUMER CARE HOLDINGS LLC F/K/A BAYER CONSUMER CARE LLC F/K/A MSD CONSUMER CARE, INC., BAYER HEALTHCARE LLC, A SUBSIDIARY OF BAYER AG, BRENNTAG NORTH AMERICA, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO MINERAL PIGMENT SOLUTIONS, INC. AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), BRENNTAG SPECIALTIES, LLC F/K/A BRENNTAG SPECIALTIES, INC. F/K/A MINERAL PIGMENT SOLUTIONS, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), CLINIQUÉ LABORATORIES, INC., A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., CLINIQUÉ LABORATORIES, LLC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., COLOR TECHNIQUES, INC., COSMETIC SPECIALTIES, INC. (SUED INDIVIDUALLY AND FORMERLY D/B/A G&G SPECIALTY PRODUCTS CO.), CROWN LABORATORIES, INC, DR. SCHOLL'S LLC, ESTEE LAUDER, INC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES, INC, THE ESTEE LAUDER COMPANIES, INC. (SUED INDIVIDUALLY AND FOR LEN-RON MANUFACTURING CO. INC.), FIESTA MART, L.L.C., FISONS CORPORATION, GSK CONSUMER HEALTH, INC. F/K/A NOVARTIS CONSUMER HEALTH INC. F/K/A CIBA SELF-MEDICATION, INC. L'OREAL USA, INC., MAYBELLINE LLC, MERCK & CO., INC., NOVARTIS CORPORATION (SUED INDIVIDUALLY AND AS A SUCCESSOR-IN-INTEREST TO CIBA-GEIGY CORPORATION AND ITS SUBSIDIARIES CIBA CONSUMER PHARMACEUTICALS AND CIBA SELF-MEDICATION, INC.), PFIZER INC., PRESPERSE CORPORATION, PRESPERSE INTERNATIONAL CORP, PTI UNION, LLC A/K/A PHARMA TECH INDUSTRIES, REVOLON CONSUMER PRODUCTS CORPORATION, SANOFI-AVENTIS U.S. LLC (SUED INDIVIDUALLY AND AS SUCCESSOR BY MERGER TO AVENTIS PHARMACEUTICALS INC.), SCHOLL'S WELLNESS COMPANY LLC, SPECIALTY MINERALS INC., (SUED INDIVIDUALLY AND AS A SUBSIDIARY OF MINERALS TECHNOLOGIES INC.), WHITTAKER CLARK & DANIELS, INC.

For suit, said suit being numbered **DC-21-07664** the nature of which demand is as follows: **Suit On OTHER (CIVIL) etc.**

as shown on said petition a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

**WITNESS:** FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office on **this the 18th day of June, 2021**

ATTEST: FELICIA PITRE Clerk of the District Courts of Dallas, County, Texas

By



KARI MALONE

, Deputy



**ESERVE (SOS)**

**CITATION**

No.: **DC-21-07664**

**ALVARO ALVARADO, et al**  
vs.  
**AVENTIS INC., et al**

**ISSUED  
ON THIS THE 18TH DAY  
OF JUNE, 2021**

FELICIA PITRE  
Clerk District Courts,  
Dallas County, Texas

By **KARI MALONE**, Deputy

---

Attorney for : Plaintiff  
**JENNIFER MONTEMAYOR**  
1201 Elm Street, Suite 3400  
Dallas, Texas 75270  
214-276-7680  
**jmontemayor@sgptrial.com**

**DALLAS COUNTY  
SERVICE FEES  
NOT PAID**

**OFFICER'S RETURN  
FOR INDIVIDUALS**

Cause No. DC-21-07664  
Court No: 160th District Court

Style: ALVARO ALVARADO, et al  
vs.  
AVENTIS INC., et al

Received this Citation the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock. Executed at \_\_\_\_\_, within the County of \_\_\_\_\_, State of \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock, by \_\_\_\_\_ delivering to the within named \_\_\_\_\_ each in person, a copy of this Citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

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**OFFICER'S RETURN  
FOR CORPORATIONS**

Received this Citation the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_M. Executed at \_\_\_\_\_, within the County of \_\_\_\_\_, State of \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock \_\_\_\_M. by summoning the within named Corporation, \_\_\_\_\_

President - Vice President - Registered Agent - in person, of the said

a true copy of this citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

-----000000-----

The distance actually traveled by me in serving such process was \_\_\_\_\_ miles and my fees are as follows: To certify which witness by my hand.

For Serving Citation \$ \_\_\_\_\_

Sheriff \_\_\_\_\_

For Mileage \$ \_\_\_\_\_

County of \_\_\_\_\_

For Notary \$ \_\_\_\_\_

State of \_\_\_\_\_

Total Fees \$ \_\_\_\_\_

By \_\_\_\_\_

(Must be verified if served outside the State of Texas)

State of \_\_\_\_\_

County of \_\_\_\_\_

Signed and sworn to me by the said \_\_\_\_\_ before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, to certify which witness my hand and seal of office.

Seal

State & County of \_\_\_\_\_

**FORM NO. 3534 CITATION**

**THE STATE OF TEXAS**

**To:** SCHOLL'S WELLNESS COMPANY LLC  
BY SERVING THE SECRETARY OF STATE  
OFFICE OF THE SECRETARY OF STATE  
CITATIONS UNIT - P.O. BOX 12079  
AUSTIN, TX, 78711

**GREETINGS:**

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **160th District Court** at 600 Commerce Street, Dallas Texas, 75202.

Said **PLAINTIFF** being **ALVARO ALVARADO AND MARIA LLANES**

Filed in said Court on the **16th day of June, 2021** against

AVENTIS INC., BAYER CONSUMER CARE HOLDINGS LLC F/K/A BAYER CONSUMER CARE LLC F/K/A MSD CONSUMER CARE, INC., BAYER HEALTHCARE LLC, A SUBSIDIARY OF BAYER AG, BRENNTAG NORTH AMERICA, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO MINERAL PIGMENT SOLUTIONS, INC. AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), BRENNTAG SPECIALTIES, LLC F/K/A BRENNTAG SPECIALTIES, INC. F/K/A MINERAL PIGMENT SOLUTIONS, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), CLINIQUÉ LABORATORIES, INC., A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., CLINIQUÉ LABORATORIES, LLC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., COLOR TECHNIQUES, INC., COSMETIC SPECIALTIES, INC. (SUED INDIVIDUALLY AND FORMERLY D/B/A G&G SPECIALTY PRODUCTS CO.), CROWN LABORATORIES, INC, DR. SCHOLL'S LLC, ESTEE LAUDER, INC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES, INC, THE ESTEE LAUDER COMPANIES, INC. (SUED INDIVIDUALLY AND FOR LEN-RON MANUFACTURING CO. INC.), FIESTA MART, L.L.C., FISONS CORPORATION, GSK CONSUMER HEALTH, INC. F/K/A NOVARTIS CONSUMER HEALTH INC. F/K/A CIBA SELF-MEDICATION, INC. L'OREAL USA, INC., MAYBELLINE LLC, MERCK & CO., INC., NOVARTIS CORPORATION (SUED INDIVIDUALLY AND AS A SUCCESSOR-IN-INTEREST TO CIBA-GEIGY CORPORATION AND ITS SUBSIDIARIES CIBA CONSUMER PHARMACEUTICALS AND CIBA SELF-MEDICATION, INC.), PFIZER INC., PRESPERSE CORPORATION, PRESPERSE INTERNATIONAL CORP, PTI UNION, LLC A/K/A PHARMA TECH INDUSTRIES, REVOLON CONSUMER PRODUCTS CORPORATION, SANOFI-AVENTIS U.S. LLC (SUED INDIVIDUALLY AND AS SUCCESSOR BY MERGER TO AVENTIS PHARMACEUTICALS INC.), SCHOLL'S WELLNESS COMPANY LLC, SPECIALTY MINERALS INC., (SUED INDIVIDUALLY AND AS A SUBSIDIARY OF MINERALS TECHNOLOGIES INC.), WHITTAKER CLARK & DANIELS, INC.

For suit, said suit being numbered **DC-21-07664** the nature of which demand is as follows: **Suit On OTHER (CIVIL) etc.**

as shown on said petition a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

**WITNESS:** FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office on **this the 18th day of June, 2021**

ATTEST: FELICIA PITRE Clerk of the District Courts of Dallas, County, Texas

By



KARI MALONE

, Deputy



**ESERVE (SOS)**

**CITATION**

No.: **DC-21-07664**

**ALVARO ALVARADO, et al**

**vs.**

**AVENTIS INC., et al**

**ISSUED  
ON THIS THE 18TH DAY  
OF JUNE, 2021**

FELICIA PITRE  
Clerk District Courts,  
Dallas County, Texas

By **KARI MALONE**, Deputy

Attorney for : Plaintiff  
**JENNIFER MONTEMAYOR**  
1201 Elm Street, Suite 3400  
Dallas, Texas 75270  
214-276-7680  
[jmontemayor@sgptrial1.com](mailto:jmontemayor@sgptrial1.com)

**DALLAS COUNTY  
SERVICE FEES  
NOT PAID**

**OFFICER'S RETURN  
FOR INDIVIDUALS**

Cause No. DC-21-07664  
Court No: 160th District Court

Style: ALVARO ALVARADO, et al  
vs.  
AVENTIS INC., et al

Received this Citation the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock. Executed at \_\_\_\_\_, within the County of \_\_\_\_\_, State of \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock, by \_\_\_\_\_ delivering to the within named \_\_\_\_\_ each in person, a copy of this Citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

-----000000-----  
**OFFICER'S RETURN  
FOR CORPORATIONS**

Received this Citation the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_M. Executed at \_\_\_\_\_, within the County of \_\_\_\_\_, State of \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock \_\_\_\_M. by summoning the within named Corporation, \_\_\_\_\_

President - Vice President - Registered Agent - in person, of the said

a true copy of this citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

-----000000-----

The distance actually traveled by me in serving such process was \_\_\_\_\_ miles and my fees are as follows: To certify which witness by my hand.

For Serving Citation \$ \_\_\_\_\_

Sheriff \_\_\_\_\_

For Mileage \$ \_\_\_\_\_

County of \_\_\_\_\_

For Notary \$ \_\_\_\_\_

State of \_\_\_\_\_

Total Fees \$ \_\_\_\_\_

By \_\_\_\_\_

(Must be verified if served outside the State of Texas)

State of \_\_\_\_\_

County of \_\_\_\_\_

Signed and sworn to me by the said \_\_\_\_\_ before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, to certify which witness my hand and seal of office.

Seal

State & County of \_\_\_\_\_

**FORM NO. 3534 CITATION**

**THE STATE OF TEXAS**

**To:** WHITTAKER CLARK & DANIELS, INC  
BY SERVING THE SECRETARY OF STATE  
OFFICE OF THE SECRETARY OF STATE  
CITATIONS UNIT - P.O. BOX 12079  
AUSTIN, TX, 78711

**GREETINGS:**

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **160th District Court** at 600 Commerce Street, Dallas Texas, 75202.

Said **PLAINTIFF** being ALVARO ALVARADO AND MARIA LLANES

Filed in said Court on the **16th day of June, 2021** against

AVENTIS INC., BAYER CONSUMER CARE HOLDINGS LLC F/K/A BAYER CONSUMER CARE LLC F/K/A MSD CONSUMER CARE, INC., BAYER HEALTHCARE LLC, A SUBSIDIARY OF BAYER AG, BRENNTAG NORTH AMERICA, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO MINERAL PIGMENT SOLUTIONS, INC. AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), BRENNTAG SPECIALTIES, LLC F/K/A BRENNTAG SPECIALTIES, INC. F/K/A MINERAL PIGMENT SOLUTIONS, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), CLINIQUÉ LABORATORIES, INC., A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., CLINIQUÉ LABORATORIES, LLC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., COLOR TECHNIQUES, INC., COSMETIC SPECIALTIES, INC. (SUED INDIVIDUALLY AND FORMERLY D/B/A G&G SPECIALTY PRODUCTS CO.), CROWN LABORATORIES, INC, DR. SCHOLL'S LLC, ESTEE LAUDER, INC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES, INC, THE ESTEE LAUDER COMPANIES, INC. (SUED INDIVIDUALLY AND FOR LEN-RON MANUFACTURING CO. INC.), FIESTA MART, L.L.C., FISONS CORPORATION, GSK CONSUMER HEALTH, INC. F/K/A NOVARTIS CONSUMER HEALTH INC. F/K/A CIBA SELF-MEDICATION, INC. L'OREAL USA, INC., MAYBELLINE LLC, MERCK & CO., INC., NOVARTIS CORPORATION (SUED INDIVIDUALLY AND AS A SUCCESSOR-IN-INTEREST TO CIBA-GEIGY CORPORATION AND ITS SUBSIDIARIES CIBA CONSUMER PHARMACEUTICALS AND CIBA SELF-MEDICATION, INC.), PFIZER INC., PRESERPSE CORPORATION, PRESERPSE INTERNATIONAL CORP, PTI UNION, LLC A/K/A PHARMA TECH INDUSTRIES, REVOLON CONSUMER PRODUCTS CORPORATION, SANOFI-AVENTIS U.S. LLC (SUED INDIVIDUALLY AND AS SUCCESSOR BY MERGER TO AVENTIS PHARMACEUTICALS INC.), SCHOLL'S WELLNESS COMPANY LLC, SPECIALTY MINERALS INC., (SUED INDIVIDUALLY AND AS A SUBSIDIARY OF MINERALS TECHNOLOGIES INC.), WHITTAKER CLARK & DANIELS, INC.

For suit, said suit being numbered **DC-21-07664** the nature of which demand is as follows: **Suit On OTHER (CIVIL) etc.**

as shown on said petition a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

**WITNESS:** FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office on **this the 18th day of June, 2021**

ATTEST: FELICIA PITRE Clerk of the District Courts of Dallas, County, Texas

By



KARI MALONE

, Deputy



**ESERVE (SOS)**

**CITATION**

No.: **DC-21-07664**

**ALVARO ALVARADO, et al**

**vs.**

**AVENTIS INC., et al**

**ISSUED  
ON THIS THE 18TH DAY  
OF JUNE, 2021**

FELICIA PITRE  
Clerk District Courts,  
Dallas County, Texas

By **KARI MALONE**, Deputy

Attorney for : Plaintiff  
**JENNIFER MONTEMAYOR**  
1201 Elm Street, Suite 3400  
Dallas, Texas 75270  
214-276-7680  
[jmontemayor@sgptrial1.com](mailto:jmontemayor@sgptrial1.com)

**DALLAS COUNTY  
SERVICE FEES  
NOT PAID**

**OFFICER'S RETURN  
FOR INDIVIDUALS**

Cause No. DC-21-07664

Court No: 160th District Court

Style: ALVARO ALVARADO, et al

vs.

AVENTIS INC., et al

Received this Citation the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock. Executed at \_\_\_\_\_, within the County of \_\_\_\_\_, State of \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock, by \_\_\_\_\_ delivering to the within named \_\_\_\_\_ each in person, a copy of this Citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

-----000000-----  
**OFFICER'S RETURN  
FOR CORPORATIONS**

Received this Citation the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_M. Executed at \_\_\_\_\_, within the County of \_\_\_\_\_, State of \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock \_\_\_\_M. by summoning the within named Corporation, \_\_\_\_\_

President - Vice President - Registered Agent - in person, of the said

a true copy of this citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

-----000000-----

The distance actually traveled by me in serving such process was \_\_\_\_\_ miles and my fees are as follows: To certify which witness by my hand.

For Serving Citation \$ \_\_\_\_\_

Sheriff \_\_\_\_\_

For Mileage \$ \_\_\_\_\_

County of \_\_\_\_\_

For Notary \$ \_\_\_\_\_

State of \_\_\_\_\_

Total Fees \$ \_\_\_\_\_

By \_\_\_\_\_

(Must be verified if served outside the State of Texas)

State of \_\_\_\_\_

County of \_\_\_\_\_

Signed and sworn to me by the said \_\_\_\_\_ before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, to certify which witness my hand and seal of office.

Seal

State & County of \_\_\_\_\_

**FORM NO. 353-3 - CITATION  
THE STATE OF TEXAS**

To: BARRETT'S MINERALS INC.  
SERVING REGISTERED AGENT CT CORPORATION SYSTEM  
1999 BRYAN STREET, SUITE 900  
DALLAS, TX 75201-3140

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **160th District Court** at 600 Commerce Street, Ste. 101, Dallas, Texas 75202.

Said Plaintiff being **ALVARO ALVARADO AND MARIA LLANES**

Filed in said Court **16th day of June, 2021** against

AVENTIS INC., BAYER CONSUMER CARE HOLDINGS LLC F/K/A BAYER CONSUMER CARE LLC F/K/A MSD CONSUMER CARE, INC., BAYER HEALTHCARE LLC, A SUBSIDIARY OF BAYER AG, BRENNAG NORTH AMERICA, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO MINERAL PIGMENT SOLUTIONS, INC. AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), BRENNAG SPECIALTIES, LLC F/K/A BRENNAG SPECIALTIES, INC. F/K/A MINERAL PIGMENT SOLUTIONS, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), CLINIQUÉ LABORATORIES, INC., A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., CLINIQUÉ LABORATORIES, LLC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., COLOR TECHNIQUES, INC, COSMETIC SPECIALTIES, INC. (SUED INDIVIDUALLY AND FORMERLY D/B/A G&G SPECIALTY PRODUCTS CO.), CROWN LABORATORIES, INC, DR. SCHOLL'S LLC, ESTEE LAUDER, INC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES, INC, THE ESTEE LAUDER COMPANIES, INC. (SUED INDIVIDUALLY AND FOR LEN-RON MANUFACTURING CO. INC.), FIESTA MART, L.L.C., FISONS CORPORATION, GSK CONSUMER HEALTH, INC. F/K/A NOVARTIS CONSUMER HEALTH INC. F/K/A CIBA SELF-MEDICATION, INC. L'OREAL USA, INC., MAYBELLINE LLC, MERCK & CO., INC., NOVARTIS CORPORATION (SUED INDIVIDUALLY AND AS A SUCCESSOR-IN-INTEREST TO CIBAGEIGY CORPORATION AND ITS SUBSIDIARIES CIBA CONSUMER PHARMACEUTICALS AND CIBA SELF-MEDICATION, INC.), PFIZER INC., PRESPERSE CORPORATION, PRESPERSE INTERNATIONAL CORP, PTI UNION, LLC A/K/A PHARMA TECH INDUSTRIES, REVOLN CONSUMER PRODUCTS CORPORATION, SANOFI-AVENTIS U.S. LLC (SUED INDIVIDUALLY AND AS SUCCESSOR BY MERGER TO AVENTIS PHARMACEUTICALS INC.), SCHOLL'S WELLNESS COMPANY LLC, SPECIALTY MINERALS INC., (SUED INDIVIDUALLY AND AS A SUBSIDIARY OF MINERALS TECHNOLOGIES INC.), WHITTAKER CLARK & DANIELS, INC.

For Suit, said suit being numbered **DC-21-07664**, the nature of which demand is as follows: Suit on **OTHER (CIVIL)** etc. as shown on said petition, a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office this 18th day of June, 2021.

ATTEST: FELICIA PITRE, Clerk of the District Courts of Dallas, County, Texas

By Kari Malone, Deputy  
KARI MALONE



**ESERVE**

**CITATION**

**DC-21-07664**

**ALVARO ALVARADO, et al**  
vs.  
**AVENTIS INC., et al**

ISSUED THIS  
**18th day of June, 2021**

FELICIA PITRE  
Clerk District Courts,  
Dallas County, Texas

By: KARI MALONE, Deputy

Attorney for Plaintiff  
**JENNIFER MONTEMAYOR**  
**1201 ELM STREET, SUITE 3400**  
**DALLAS, TEXAS 75270**  
**214-276-7680**  
**JMONTEMAYOR@SGPTRIA1.COM**

**DALLAS COUNTY  
SERVICE FEES  
NOT PAID**

## OFFICER'S RETURN

Case No. : DC-21-07664

Court No.160th District Court

Style: ALVARO ALVARADO, et al

vs.

AVENTIS INC., et al

Came to hand on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_, at \_\_\_\_\_ o'clock \_\_\_\_\_.M. Executed at \_\_\_\_\_,  
within the County of \_\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_\_.M. on the \_\_\_\_\_ day of \_\_\_\_\_,  
20\_\_\_\_\_, by delivering to the within named \_\_\_\_\_

---

each in person, a true copy of this Citation together with the accompanying copy of this pleading, having first endorsed on same date of delivery. The distance actually traveled by me in serving such process was \_\_\_\_\_ miles and my fees are as follows: To certify which witness my hand.

For serving Citation \$ \_\_\_\_\_

For mileage \$ \_\_\_\_\_ of \_\_\_\_\_ County, \_\_\_\_\_

For Notary \$ \_\_\_\_\_ By \_\_\_\_\_ Deputy

(Must be verified if served outside the State of Texas.)

Signed and sworn to by the said \_\_\_\_\_ before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_,  
to certify which witness my hand and seal of office.

---

Notary Public \_\_\_\_\_ County \_\_\_\_\_

**FORM NO. 353-3 - CITATION  
THE STATE OF TEXAS**

**To:** BAYER HEALTHCARE LLC, A SUBSIDIARY OF BAYER AG, FOR ITS DR. SCHOLL'S LINE OF PRODUCTS  
SERVING AGENT CORPORATION SERVICE COMPANY D/B/A LAWYERS INCORPORATING SERVICE COMPANY  
211 E. 7TH STREET, SUITE 620  
AUSTIN, TX 78701-3218

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **160th District Court** at 600 Commerce Street, Ste. 101, Dallas, Texas 75202.

Said Plaintiff being **ALVARO ALVARADO AND MARIA LLANES**

Filed in said Court **16th day of June, 2021** against

AVENTIS INC., BAYER CONSUMER CARE HOLDINGS LLC F/K/A BAYER CONSUMER CARE LLC F/K/A MSD CONSUMER CARE, INC., BAYER HEALTHCARE LLC, A SUBSIDIARY OF BAYER AG, BRENNTAG NORTH AMERICA, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO MINERAL PIGMENT SOLUTIONS, INC. AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), BRENNTAG SPECIALTIES, LLC F/K/A BRENNTAG SPECIALTIES, INC. F/K/A MINERAL PIGMENT SOLUTIONS, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), CLINIQUE LABORATORIES, INC., A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., CLINIQUE LABORATORIES, LLC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., COLOR TECHNIQUES, INC, COSMETIC SPECIALTIES, INC. (SUED INDIVIDUALLY AND FORMERLY D/B/A G&G SPECIALTY PRODUCTS CO.), CROWN LABORATORIES, INC, DR. SCHOLL'S LLC, ESTEE LAUDER, INC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES, INC, THE ESTEE LAUDER COMPANIES, INC. (SUED INDIVIDUALLY AND FOR LEN-RON MANUFACTURING CO. INC.), FIESTA MART, L.L.C., FISONS CORPORATION, GSK CONSUMER HEALTH, INC. F/K/A NOVARTIS CONSUMER HEALTH INC. F/K/A CIBA SELF-MEDICATION, INC. L'OREAL USA, INC., MAYBELLINE LLC, MERCK & CO., INC., NOVARTIS CORPORATION (SUED INDIVIDUALLY AND AS A SUCCESSOR-IN-INTEREST TO CIBA-GEIGY CORPORATION AND ITS SUBSIDIARIES CIBA CONSUMER PHARMACEUTICALS AND CIBA SELF-MEDICATION, INC.), PFIZER INC., PRESPERSE CORPORATION, PRESPERSE INTERNATIONAL CORP, PTI UNION, LLC A/K/A PHARMA TECH INDUSTRIES, REVOLN CONSUMER PRODUCTS CORPORATION, SANOFI-AVENTIS U.S. LLC (SUED INDIVIDUALLY AND AS SUCCESSOR BY MERGER TO AVENTIS PHARMACEUTICALS INC.), SCHOLL'S WELLNESS COMPANY LLC, SPECIALTY MINERALS INC., (SUED INDIVIDUALLY AND AS A SUBSIDIARY OF MINERALS TECHNOLOGIES INC.), WHITTAKER CLARK & DANIELS, INC.

For Suit, said suit being numbered **DC-21-07664**, the nature of which demand is as follows: Suit on **OTHER (CIVIL)** etc. as shown on said petition, a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office this 18th day of June, 2021.

ATTEST: FELICIA PITRE, Clerk of the District Courts of Dallas, County, Texas

By Kari Malone, Deputy  
KARI MALONE



**ESERVE**

**CITATION**

**DC-21-07664**

**ALVARO ALVARADO, et al**  
vs.  
**AVENTIS INC., et al**

ISSUED THIS  
**18th day of June, 2021**

FELICIA PITRE  
Clerk District Courts,  
Dallas County, Texas

By: KARI MALONE, Deputy

Attorney for Plaintiff  
**JENNIFER MONTEMAYOR**  
**1201 ELM STREET, SUITE 3400**  
**DALLAS, TEXAS 75270**  
**214-276-7680**

**JMONTEMAYOR@SGPTRIA1.COM**

**DALLAS COUNTY  
SERVICE FEES  
NOT PAID**

## OFFICER'S RETURN

Case No. : DC-21-07664

Court No.160th District Court

Style: ALVARO ALVARADO, et al

vs.

AVENTIS INC., et al

Came to hand on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_, at \_\_\_\_\_ o'clock \_\_\_\_\_.M. Executed at \_\_\_\_\_,  
within the County of \_\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_\_.M. on the \_\_\_\_\_ day of \_\_\_\_\_,  
20\_\_\_\_\_, by delivering to the within named \_\_\_\_\_

---

each in person, a true copy of this Citation together with the accompanying copy of this pleading, having first endorsed on same date of delivery. The distance actually traveled by me in serving such process was \_\_\_\_\_ miles and my fees are as follows: To certify which witness my hand.

For serving Citation \$\_\_\_\_\_

For mileage \$\_\_\_\_\_ of \_\_\_\_\_ County, \_\_\_\_\_

For Notary \$\_\_\_\_\_ By \_\_\_\_\_ Deputy

(Must be verified if served outside the State of Texas.)

Signed and sworn to by the said \_\_\_\_\_ before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_,  
to certify which witness my hand and seal of office.

---

Notary Public \_\_\_\_\_ County \_\_\_\_\_

**FORM NO. 353-3 - CITATION  
THE STATE OF TEXAS**

**To:** BRENNETAG SPECIALTIES, LLC F/K/A BRENNETAG SPECIALTIES, INC. F/K/A MINERAL PIGMENT SOLUTIONS, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.) SERVING REGISTERED AGENT CT CORPORATION SYSTEM 1999 BRYAN STREET, SUITE 900 DALLAS, TX 75201-3140

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **160th District Court** at 600 Commerce Street, Ste. 101, Dallas, Texas 75202.

Said Plaintiff being **ALVARO ALVARADO AND MARIA LLANES**

Filed in said Court **16th day of June, 2021** against

AVENTIS INC., BAYER CONSUMER CARE HOLDINGS LLC F/K/A BAYER CONSUMER CARE LLC F/K/A MSD CONSUMER CARE, INC., BAYER HEALTHCARE LLC, A SUBSIDIARY OF BAYER AG, BRENNETAG NORTH AMERICA, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO MINERAL PIGMENT SOLUTIONS, INC. AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), BRENNETAG SPECIALTIES, LLC F/K/A BRENNETAG SPECIALTIES, INC. F/K/A MINERAL PIGMENT SOLUTIONS, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), CLINIQUÉ LABORATORIES, INC., A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., CLINIQUÉ LABORATORIES, LLC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., COLOR TECHNIQUES, INC, COSMETIC SPECIALTIES, INC. (SUED INDIVIDUALLY AND FORMERLY D/B/A G&G SPECIALTY PRODUCTS CO.), CROWN LABORATORIES, INC, DR. SCHOLL'S LLC, ESTEE LAUDER, INC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES, INC, THE ESTEE LAUDER COMPANIES, INC. (SUED INDIVIDUALLY AND FOR LEN-RON MANUFACTURING CO. INC.), FIESTA MART, L.L.C., FISONS CORPORATION, GSK CONSUMER HEALTH, INC. F/K/A NOVARTIS CONSUMER HEALTH INC. F/K/A CIBA SELF-MEDICATION, INC. L'OREAL USA, INC., MAYBELLINE LLC, MERCK & CO., INC., NOVARTIS CORPORATION (SUED INDIVIDUALLY AND AS A SUCCESSOR-IN-INTEREST TO CIBA-GEIGY CORPORATION AND ITS SUBSIDIARIES CIBA CONSUMER PHARMACEUTICALS AND CIBA SELF-MEDICATION, INC.), PFIZER INC., PRESPERSE CORPORATION, PRESPERSE INTERNATIONAL CORP, PTI UNION, LLC A/K/A PHARMA TECH INDUSTRIES, REVOLON CONSUMER PRODUCTS CORPORATION, SANOFI-AVENTIS U.S. LLC (SUED INDIVIDUALLY AND AS SUCCESSOR BY MERGER TO AVENTIS PHARMACEUTICALS INC.), SCHOLL'S WELLNESS COMPANY LLC, SPECIALTY MINERALS INC., (SUED INDIVIDUALLY AND AS A SUBSIDIARY OF MINERALS TECHNOLOGIES INC.), WHITTAKER CLARK & DANIELS, INC.

For Suit, said suit being numbered **DC-21-07664**, the nature of which demand is as follows: Suit on **OTHER (CIVIL)** etc. as shown on said petition, a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office this 18th day of June, 2021.

ATTEST: FELICIA PITRE, Clerk of the District Courts of Dallas, County, Texas

By Kari Malone, Deputy  
KARI MALONE



**ESERVE**

**CITATION**

**DC-21-07664**

**ALVARO ALVARADO, et al**  
vs.  
**AVENTIS INC., et al**

**ISSUED THIS**  
**18th day of June, 2021**

**FELICIA PITRE**  
Clerk District Courts,  
Dallas County, Texas

**By: KARI MALONE, Deputy**

**Attorney for Plaintiff**  
**JENNIFER MONTEMAYOR**  
**1201 ELM STREET, SUITE 3400**  
**DALLAS, TEXAS 75270**  
**214-276-7680**  
**JMONTEMAYOR@SGPTRIA1.COM**

**DALLAS COUNTY**  
**SERVICE FEES**  
**NOT PAID**

## OFFICER'S RETURN

Case No. : DC-21-07664

Court No.160th District Court

Style: ALVARO ALVARADO, et al

vs.

AVENTIS INC., et al

Came to hand on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_, at \_\_\_\_\_ o'clock \_\_\_\_\_.M. Executed at \_\_\_\_\_,  
within the County of \_\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_\_.M. on the \_\_\_\_\_ day of \_\_\_\_\_,  
20\_\_\_\_\_, by delivering to the within named \_\_\_\_\_

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each in person, a true copy of this Citation together with the accompanying copy of this pleading, having first endorsed on same date of delivery. The distance actually traveled by me in serving such process was \_\_\_\_\_ miles and my fees are as follows: To certify which witness my hand.

For serving Citation \$ \_\_\_\_\_

For mileage \$ \_\_\_\_\_ of \_\_\_\_\_ County, \_\_\_\_\_

For Notary \$ \_\_\_\_\_ By \_\_\_\_\_ Deputy

(Must be verified if served outside the State of Texas.)

Signed and sworn to by the said \_\_\_\_\_ before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_,  
to certify which witness my hand and seal of office.

---

Notary Public \_\_\_\_\_ County \_\_\_\_\_

**FORM NO. 353-3 - CITATION  
THE STATE OF TEXAS**

To: FIESTA MART, L.L.C.  
SERVING REGISTERED AGENT CT CORPORATION SYSTEM  
1999 BRYAN STREET, SUITE 900  
DALLAS, TX 75201-3140

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **160th District Court** at 600 Commerce Street, Ste. 101, Dallas, Texas 75202.

Said Plaintiff being **ALVARO ALVARADO AND MARIA LLANES**

Filed in said Court **16th day of June, 2021** against

AVENTIS INC., BAYER CONSUMER CARE HOLDINGS LLC F/K/A BAYER CONSUMER CARE LLC F/K/A MSD CONSUMER CARE, INC., BAYER HEALTHCARE LLC, A SUBSIDIARY OF BAYER AG, BRENNAG NORTH AMERICA, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO MINERAL PIGMENT SOLUTIONS, INC. AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), BRENNAG SPECIALTIES, LLC F/K/A BRENNAG SPECIALTIES, INC. F/K/A MINERAL PIGMENT SOLUTIONS, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), CLINIQUE LABORATORIES, INC., A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., CLINIQUE LABORATORIES, LLC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., COLOR TECHNIQUES, INC, COSMETIC SPECIALTIES, INC. (SUED INDIVIDUALLY AND FORMERLY D/B/A G&G SPECIALTY PRODUCTS CO.), CROWN LABORATORIES, INC, DR. SCHOLL'S LLC, ESTEE LAUDER, INC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES, INC, THE ESTEE LAUDER COMPANIES, INC. (SUED INDIVIDUALLY AND FOR LEN-RON MANUFACTURING CO. INC.), FIESTA MART, L.L.C., FISONS CORPORATION, GSK CONSUMER HEALTH, INC. F/K/A NOVARTIS CONSUMER HEALTH INC. F/K/A CIBA SELF-MEDICATION, INC. L'OREAL USA, INC., MAYBELLINE LLC, MERCK & CO., INC., NOVARTIS CORPORATION (SUED INDIVIDUALLY AND AS A SUCCESSOR-IN-INTEREST TO CIBA-GEIGY CORPORATION AND ITS SUBSIDIARIES CIBA CONSUMER PHARMACEUTICALS AND CIBA SELF-MEDICATION, INC.), PFIZER INC., PRESPERSE CORPORATION, PRESPERSE INTERNATIONAL CORP, PTI UNION, LLC A/K/A PHARMA TECH INDUSTRIES, REVOLN CONSUMER PRODUCTS CORPORATION, SANOFI-AVENTIS U.S. LLC (SUED INDIVIDUALLY AND AS SUCCESSOR BY MERGER TO AVENTIS PHARMACEUTICALS INC.), SCHOLL'S WELLNESS COMPANY LLC, SPECIALTY MINERALS INC., (SUED INDIVIDUALLY AND AS A SUBSIDIARY OF MINERALS TECHNOLOGIES INC.), WHITTAKER CLARK & DANIELS, INC.

For Suit, said suit being numbered **DC-21-07664**, the nature of which demand is as follows: Suit on **OTHER (CIVIL)** etc. as shown on said petition, a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office this 18th day of June, 2021.

ATTEST: FELICIA PITRE, Clerk of the District Courts of Dallas, County, Texas

By Kari Malone, Deputy  
KARI MALONE



**ESERVE**

**CITATION**

**DC-21-07664**

**ALVARO ALVARADO, et al**  
vs.  
**AVENTIS INC., et al**

**ISSUED THIS  
18th day of June, 2021**

**FELICIA PITRE**  
Clerk District Courts,  
Dallas County, Texas

**By: KARI MALONE, Deputy**

**Attorney for Plaintiff  
JENNIFER MONTEMAYOR  
1201 ELM STREET, SUITE 3400  
DALLAS, TEXAS 75270  
214-276-7680**

**JMONTEMAYOR@SGPTRIA1.COM**

**DALLAS COUNTY  
SERVICE FEES  
NOT PAID**

## OFFICER'S RETURN

Case No. : DC-21-07664

Court No.160th District Court

Style: ALVARO ALVARADO, et al

vs.

AVENTIS INC., et al

Came to hand on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_, at \_\_\_\_\_ o'clock \_\_\_\_\_.M. Executed at \_\_\_\_\_,  
within the County of \_\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_\_.M. on the \_\_\_\_\_ day of \_\_\_\_\_,  
20\_\_\_\_\_, by delivering to the within named \_\_\_\_\_

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For serving Citation \$\_\_\_\_\_

For mileage \$\_\_\_\_\_ of \_\_\_\_\_ County, \_\_\_\_\_

For Notary \$\_\_\_\_\_ By \_\_\_\_\_ Deputy

(Must be verified if served outside the State of Texas.)

Signed and sworn to by the said \_\_\_\_\_ before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_,

to certify which witness my hand and seal of office.

---

Notary Public \_\_\_\_\_ County \_\_\_\_\_

**FORM NO. 353-3 - CITATION  
THE STATE OF TEXAS**

To: MERCK & CO., INC.  
SERVING REGISTERED AGENT CT CORPORATION SYSTEM  
1999 BRYAN STREET, SUITE 900  
DALLAS, TX 75201-3140

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **160th District Court** at 600 Commerce Street, Ste. 101, Dallas, Texas 75202.

Said Plaintiff being **ALVARO ALVARADO AND MARIA LLANES**

Filed in said Court **16th day of June, 2021** against

AVENTIS INC., BAYER CONSUMER CARE HOLDINGS LLC F/K/A BAYER CONSUMER CARE LLC F/K/A MSD CONSUMER CARE, INC., BAYER HEALTHCARE LLC, A SUBSIDIARY OF BAYER AG, BRENNAG NORTH AMERICA, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO MINERAL PIGMENT SOLUTIONS, INC. AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), BRENNAG SPECIALTIES, LLC F/K/A BRENNAG SPECIALTIES, INC. F/K/A MINERAL PIGMENT SOLUTIONS, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), CLINIQUÉ LABORATORIES, INC., A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., CLINIQUÉ LABORATORIES, LLC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., COLOR TECHNIQUES, INC, COSMETIC SPECIALTIES, INC. (SUED INDIVIDUALLY AND FORMERLY D/B/A G&G SPECIALTY PRODUCTS CO.), CROWN LABORATORIES, INC, DR. SCHOLL'S LLC, ESTEE LAUDER, INC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES, INC, THE ESTEE LAUDER COMPANIES, INC. (SUED INDIVIDUALLY AND FOR LEN-RON MANUFACTURING CO. INC.), FIESTA MART, L.L.C., FISONS CORPORATION, GSK CONSUMER HEALTH, INC. F/K/A NOVARTIS CONSUMER HEALTH INC. F/K/A CIBA SELF-MEDICATION, INC. L'OREAL USA, INC., MAYBELLINE LLC, MERCK & CO., INC., NOVARTIS CORPORATION (SUED INDIVIDUALLY AND AS A SUCCESSOR-IN-INTEREST TO CIBA-GEIGY CORPORATION AND ITS SUBSIDIARIES CIBA CONSUMER PHARMACEUTICALS AND CIBA SELF-MEDICATION, INC.), PFIZER INC., PRESPERSE CORPORATION, PRESPERSE INTERNATIONAL CORP, PTI UNION, LLC A/K/A PHARMA TECH INDUSTRIES, REVLON CONSUMER PRODUCTS CORPORATION, SANOFI-AVENTIS U.S. LLC (SUED INDIVIDUALLY AND AS SUCCESSOR BY MERGER TO AVENTIS PHARMACEUTICALS INC.), SCHOLL'S WELLNESS COMPANY LLC, SPECIALTY MINERALS INC., (SUED INDIVIDUALLY AND AS A SUBSIDIARY OF MINERALS TECHNOLOGIES INC.), WHITTAKER CLARK & DANIELS, INC.

For Suit, said suit being numbered **DC-21-07664**, the nature of which demand is as follows: Suit on **OTHER (CIVIL)** etc. as shown on said petition, a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office this 18th day of June, 2021.

ATTEST: FELICIA PITRE, Clerk of the District Courts of Dallas, County, Texas

By Kari Malone, Deputy  
KARI MALONE



**ESERVE**

**CITATION**

**DC-21-07664**

**ALVARO ALVARADO, et al**  
vs.  
**AVENTIS INC., et al**

ISSUED THIS  
**18th day of June, 2021**

FELICIA PITRE  
Clerk District Courts,  
Dallas County, Texas

By: KARI MALONE, Deputy

Attorney for Plaintiff  
**JENNIFER MONTEMAYOR**  
**1201 ELM STREET, SUITE 3400**  
**DALLAS, TEXAS 75270**  
**214-276-7680**  
**JMONTEMAYOR@SGPTRIA1.COM**

**DALLAS COUNTY  
SERVICE FEES  
NOT PAID**

## OFFICER'S RETURN

Case No. : DC-21-07664

Court No.160th District Court

Style: ALVARO ALVARADO, et al

vs.

AVENTIS INC., et al

Came to hand on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_, at \_\_\_\_\_ o'clock \_\_\_\_\_.M. Executed at \_\_\_\_\_,  
within the County of \_\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_\_.M. on the \_\_\_\_\_ day of \_\_\_\_\_,  
20\_\_\_\_\_, by delivering to the within named \_\_\_\_\_

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each in person, a true copy of this Citation together with the accompanying copy of this pleading, having first endorsed on same date of delivery. The distance actually traveled by me in serving such process was \_\_\_\_\_ miles and my fees are as follows: To certify which witness my hand.

For serving Citation \$ \_\_\_\_\_

For mileage \$ \_\_\_\_\_ of \_\_\_\_\_ County, \_\_\_\_\_

For Notary \$ \_\_\_\_\_ By \_\_\_\_\_ Deputy

(Must be verified if served outside the State of Texas.)

Signed and sworn to by the said \_\_\_\_\_ before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_,  
to certify which witness my hand and seal of office.

---

Notary Public \_\_\_\_\_ County \_\_\_\_\_

**FORM NO. 353-3 - CITATION  
THE STATE OF TEXAS**

To: PFIZER INC.  
SERVING REGISTERED AGENT CT CORPORATION SYSTEM  
1999 BRYAN STREET, SUITE 900  
DALLAS, TX 75201-3140

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **160th District Court** at 600 Commerce Street, Ste. 101, Dallas, Texas 75202.

Said Plaintiff being **ALVARO ALVARADO AND MARIA LLANES**

Filed in said Court **16th day of June, 2021** against

AVENTIS INC., BAYER CONSUMER CARE HOLDINGS LLC F/K/A BAYER CONSUMER CARE LLC F/K/A MSD CONSUMER CARE, INC., BAYER HEALTHCARE LLC, A SUBSIDIARY OF BAYER AG, BRENNAG NORTH AMERICA, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO MINERAL PIGMENT SOLUTIONS, INC. AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), BRENNAG SPECIALTIES, LLC F/K/A BRENNAG SPECIALTIES, INC. F/K/A MINERAL PIGMENT SOLUTIONS, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), CLINIQUÉ LABORATORIES, INC., A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., CLINIQUÉ LABORATORIES, LLC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., COLOR TECHNIQUES, INC, COSMETIC SPECIALTIES, INC. (SUED INDIVIDUALLY AND FORMERLY D/B/A G&G SPECIALTY PRODUCTS CO.), CROWN LABORATORIES, INC, DR. SCHOLL'S LLC, ESTEE LAUDER, INC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES, INC, THE ESTEE LAUDER COMPANIES, INC. (SUED INDIVIDUALLY AND FOR LEN-RON MANUFACTURING CO. INC.), FIESTA MART, L.L.C., FISONS CORPORATION, GSK CONSUMER HEALTH, INC. F/K/A NOVARTIS CONSUMER HEALTH INC. F/K/A CIBA SELF-MEDICATION, INC. L'OREAL USA, INC., MAYBELLINE LLC, MERCK & CO., INC., NOVARTIS CORPORATION (SUED INDIVIDUALLY AND AS A SUCCESSOR-IN-INTEREST TO CIBAGEIGY CORPORATION AND ITS SUBSIDIARIES CIBA CONSUMER PHARMACEUTICALS AND CIBA SELF-MEDICATION, INC.), PFIZER INC., PRESPERSE CORPORATION, PRESPERSE INTERNATIONAL CORP, PTI UNION, LLC A/K/A PHARMA TECH INDUSTRIES, REVLON CONSUMER PRODUCTS CORPORATION, SANOFI-AVENTIS U.S. LLC (SUED INDIVIDUALLY AND AS SUCCESSOR BY MERGER TO AVENTIS PHARMACEUTICALS INC.), SCHOLL'S WELLNESS COMPANY LLC, SPECIALTY MINERALS INC., (SUED INDIVIDUALLY AND AS A SUBSIDIARY OF MINERALS TECHNOLOGIES INC.), WHITTAKER CLARK & DANIELS, INC.

For Suit, said suit being numbered **DC-21-07664**, the nature of which demand is as follows: Suit on **OTHER (CIVIL)** etc. as shown on said petition, a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office this 18th day of June, 2021.

ATTEST: FELICIA PITRE, Clerk of the District Courts of Dallas, County, Texas

By Kari Malone, Deputy  
KARI MALONE



**ESERVE**

**CITATION**

**DC-21-07664**

**ALVARO ALVARADO, et al**  
vs.  
**AVENTIS INC., et al**

ISSUED THIS  
**18th day of June, 2021**

FELICIA PITRE  
Clerk District Courts,  
Dallas County, Texas

By: KARI MALONE, Deputy

Attorney for Plaintiff  
**JENNIFER MONTEMAYOR**  
**1201 ELM STREET, SUITE 3400**  
**DALLAS, TEXAS 75270**  
**214-276-7680**  
**JMONTEMAYOR@SGPTRIA1.COM**

**DALLAS COUNTY  
SERVICE FEES  
NOT PAID**

## OFFICER'S RETURN

Case No. : DC-21-07664

Court No.160th District Court

Style: ALVARO ALVARADO, et al

vs.

AVENTIS INC., et al

Came to hand on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_, at \_\_\_\_\_ o'clock \_\_\_\_\_.M. Executed at \_\_\_\_\_,  
within the County of \_\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_\_.M. on the \_\_\_\_\_ day of \_\_\_\_\_,  
20\_\_\_\_\_, by delivering to the within named \_\_\_\_\_

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For serving Citation \$ \_\_\_\_\_

For mileage \$ \_\_\_\_\_ of \_\_\_\_\_ County, \_\_\_\_\_

For Notary \$ \_\_\_\_\_ By \_\_\_\_\_ Deputy

(Must be verified if served outside the State of Texas.)

Signed and sworn to by the said \_\_\_\_\_ before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_,

to certify which witness my hand and seal of office.

---

Notary Public \_\_\_\_\_ County \_\_\_\_\_

**FORM NO. 353-3 - CITATION  
THE STATE OF TEXAS**

**To:** SPECIALTY MINERALS INC. (SUED INDIVIDUALLY AND AS A SUBSIDIARY OF MINERALS TECHNOLOGIES INC.)  
SERVING REGISTERED AGENT CT CORPORATION SYSTEM  
1999 BRYAN STREET, SUITE 900  
DALLAS, TX 75201-3140

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **160th District Court** at 600 Commerce Street, Ste. 101, Dallas, Texas 75202.

Said Plaintiff being **ALVARO ALVARADO AND MARIA LLANES**

Filed in said Court **16th day of June, 2021** against

AVENTIS INC., BAYER CONSUMER CARE HOLDINGS LLC F/K/A BAYER CONSUMER CARE LLC F/K/A MSD CONSUMER CARE, INC., BAYER HEALTHCARE LLC, A SUBSIDIARY OF BAYER AG, BRENNAG NORTH AMERICA, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO MINERAL PIGMENT SOLUTIONS, INC. AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), BRENNAG SPECIALTIES, LLC F/K/A BRENNAG SPECIALTIES, INC. F/K/A MINERAL PIGMENT SOLUTIONS, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), CLINIQUÉ LABORATORIES, INC., A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., CLINIQUÉ LABORATORIES, LLC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., COLOR TECHNIQUES, INC, COSMETIC SPECIALTIES, INC. (SUED INDIVIDUALLY AND FORMERLY D/B/A G&G SPECIALTY PRODUCTS CO.), CROWN LABORATORIES, INC, DR. SCHOLL'S LLC, ESTEE LAUDER, INC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES, INC, THE ESTEE LAUDER COMPANIES, INC. (SUED INDIVIDUALLY AND FOR LEN-RON MANUFACTURING CO. INC.), FIESTA MART, L.L.C., FISONS CORPORATION, GSK CONSUMER HEALTH, INC. F/K/A NOVARTIS CONSUMER HEALTH INC. F/K/A CIBA SELF-MEDICATION, INC. L'OREAL USA, INC., MAYBELLINE LLC, MERCK & CO., INC., NOVARTIS CORPORATION (SUED INDIVIDUALLY AND AS A SUCCESSOR-IN-INTEREST TO CIBA-GEIGY CORPORATION AND ITS SUBSIDIARIES CIBA CONSUMER PHARMACEUTICALS AND CIBA SELF-MEDICATION, INC.), PFIZER INC., PRESPERSE CORPORATION, PRESPERSE INTERNATIONAL CORP, PTI UNION, LLC A/K/A PHARMA TECH INDUSTRIES, REVLON CONSUMER PRODUCTS CORPORATION, SANOFI-AVENTIS U.S. LLC (SUED INDIVIDUALLY AND AS SUCCESSOR BY MERGER TO AVENTIS PHARMACEUTICALS INC.), SCHOLL'S WELLNESS COMPANY LLC, SPECIALTY MINERALS INC., (SUED INDIVIDUALLY AND AS A SUBSIDIARY OF MINERALS TECHNOLOGIES INC.), WHITTAKER CLARK & DANIELS, INC.

For Suit, said suit being numbered **DC-21-07664**, the nature of which demand is as follows: Suit on **OTHER (CIVIL)** etc. as shown on said petition, a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office this 18th day of June, 2021.

ATTEST: FELICIA PITRE, Clerk of the District Courts of Dallas, County, Texas

By Kari Malone, Deputy  
KARI MALONE



**ESERVE**

**CITATION**

**DC-21-07664**

**ALVARO ALVARADO, et al**  
vs.  
**AVENTIS INC., et al**

ISSUED THIS  
**18th day of June, 2021**

FELICIA PITRE  
Clerk District Courts,  
Dallas County, Texas

By: KARI MALONE, Deputy

Attorney for Plaintiff  
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**DALLAS COUNTY  
SERVICE FEES  
NOT PAID**

## OFFICER'S RETURN

Case No. : DC-21-07664

Court No.160th District Court

Style: ALVARO ALVARADO, et al

vs.

AVENTIS INC., et al

Came to hand on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_, at \_\_\_\_\_ o'clock \_\_\_\_\_.M. Executed at \_\_\_\_\_,  
within the County of \_\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_\_.M. on the \_\_\_\_\_ day of \_\_\_\_\_,  
20\_\_\_\_\_, by delivering to the within named \_\_\_\_\_

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each in person, a true copy of this Citation together with the accompanying copy of this pleading, having first endorsed on same date of delivery. The distance actually traveled by me in serving such process was \_\_\_\_\_ miles and my fees are as follows: To certify which witness my hand.

For serving Citation \$ \_\_\_\_\_

For mileage \$ \_\_\_\_\_ of \_\_\_\_\_ County, \_\_\_\_\_

For Notary \$ \_\_\_\_\_ By \_\_\_\_\_ Deputy

(Must be verified if served outside the State of Texas.)

Signed and sworn to by the said \_\_\_\_\_ before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_,

to certify which witness my hand and seal of office.

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Notary Public \_\_\_\_\_ County \_\_\_\_\_

**CAUSE NO. DC-21-07664**

**ALVARO ALVARADO and MARIA DEL  
ROSARIO TOBIAS,** IN THE DISTRICT COURT

*Plaintiffs,*

160<sup>TH</sup> JUDICIAL DISTRICT

vs.

DALLAS COUNTY, TEXAS

**AVENTIS INC.**, for its Desenex line of products;

**BARRETT'S MINERALS INC.;**

**BAYER CONSUMER CARE HOLDINGS LLC** f/k/a BAYER CONSUMER CARE LLC f/k/a MSD CONSUMER CARE, INC., for its Dr. Scholl's line of products;

**BAYER HEALTHCARE LLC**, a subsidiary of BAYER AG, for its Dr. Scholl's line of products;

**BRENNTAG NORTH AMERICA, INC.** (sued individually and as successor-in-interest to MINERAL PIGMENT SOLUTIONS, INC. and as successor-in-interest to WHITTAKER CLARK & DANIELS, INC.);

**BRENNTAG SPECIALTIES, LLC** f/k/a BRENNTAG SPECIALTIES, INC. f/k/a MINERAL PIGMENT SOLUTIONS, INC. (sued individually and as successor-in-interest to WHITTAKER CLARK & DANIELS, INC.); **CLINIQUE LABORATORIES, INC.**, a subsidiary of THE ESTÉÉ LAUDER COMPANIES INC.;

**CLINIQUE LABORATORIES, LLC**, a subsidiary of THE ESTÉÉ LAUDER COMPANIES INC.;

**COLOR TECHNIQUES, INC.;**

**COSMETIC SPECIALTIES, INC.** (sued individually and formerly d/b/a G&G SPECIALTY PRODUCTS CO.);

**CROWN LABORATORIES, INC.** for its Desenex line of products;

**DR. SCHOLL'S LLC;**

**ESTÉÉ LAUDER, INC.**, a subsidiary of THE ESTÉÉ LAUDER COMPANIES, INC. for its Clinique line of products;

**THE ESTÉÉ LAUDER COMPANIES, INC.** (sued individually and for Len-Ron

Manufacturing Co. Inc.) for its Clinique line of products;

**FIESTA MART, L.L.C.;**

**FISONS CORPORATION**, for its Desenex line of products;

**GSK CONSUMER HEALTH, INC.** f/k/a NOVARTIS CONSUMER HEALTH INC. f/k/a CIBA SELF-MEDICATION, INC., for its Desenex line of products;

**L'OREAL USA, INC.;**

**MAYBELLINE LLC;**

**MERCK & CO., INC.**, for its Dr. Scholl's line of products;

**NOVARTIS CORPORATION** (sued individually and as a successor-in-interest to CIBA-GEIGY CORPORATION and its subsidiaries CIBA CONSUMER PHARMACEUTICALS and CIBA SELF-MEDICATION, INC.), for its Desenex line of products;

**PFIZER INC.;**

**PRESPERSE CORPORATION;**

**PRESPERSE INTERNATIONAL CORP;**

**PTI UNION, LLC** a/k/a PHARMA TECH INDUSTRIES, for its Desenex line of products;

**REVLON CONSUMER PRODUCTS CORPORATION;**

**SANOFI-AVENTIS U.S. LLC** (sued individually and as successor by merger to AVENTIS PHARMACEUTICALS INC.), for its Desenex line of products;

**SCHOLL'S WELLNESS COMPANY LLC**, for its Dr. Scholl's line of products;

**SPECIALTY MINERALS INC.** (sued individually and as a subsidiary of MINERALS TECHNOLOGIES INC.); and

**WHITTAKER CLARK & DANIELS, INC.,**

*Defendants.*

**PLAINTIFFS' FIRST AMENDED COMPLAINT AND JURY DEMAND**

**TO THE HONORABLE JUDGE OF SAID COURT:**

COME NOW Plaintiffs, ALVARO ALVARADO and MARIA DEL ROSARIO TOBIAS, who complain of the various Defendants listed below and for cause of action would show the Court and Jury as follows:

I.

1. Pursuant to T.R.C.P. 190.1, Discovery will be conducted under Level 3 (T.R.C.P. 190.4). Certain Defendants named herein reside in this County, maintain offices in this County and/or have their principal place of business in this County, and/or all or a substantial part of the acts or omissions that form the basis of this lawsuit occurred in this County, therefore, venue properly lies in this County. Certain acts or omissions, which were a proximate or producing cause of Plaintiff ALVARO ALVARADO's asbestos-related injuries, occurred in Texas.

2. The damages Plaintiffs seek are within the jurisdictional limits of this Court. As required by Texas Rule of Civil Procedure 47(c), Plaintiffs state that they seek monetary relief over \$1,000,000.00 for the injuries alleged in this Complaint. Plaintiffs further seek any relief in equity to which they are justly entitled.

3. Plaintiffs ALVARO ALVARADO and MARIA DEL ROSARIO TOBIAS reside at 5625 Parkdale Drive, Dallas, Texas 75227.

4. Although Defendant **AVENTIS INC.**, for its Desenex line of products, has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said corporation may be served with process at its registered agent in Pennsylvania, Corporation Service Company, 2595 Interstate Drive, Suite 103, Harrisburg, PA 17110. Defendant **AVENTIS INC.**, for its Desenex line of products, may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a manufacturer of asbestos-containing Desenex Foot Powder.

5. Defendant **BARRETT'S MINERALS INC.** may be served through its registered agent for service of process, CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, TX 75201-3140. This Defendant is being sued as a supplier of asbestos-containing talc.

6. Although Defendant **BAYER CONSUMER CARE HOLDINGS LLC** f/k/a **BAYER CONSUMER CARE LLC** f/k/a **MSD CONSUMER CARE, INC.**, for its Dr. Scholl's line of products, has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said limited liability company may be served with process at its registered agent in Delaware, Corporation Service Company, 251 Little Falls Drive, Wilmington, DE 19808. Defendant **BAYER CONSUMER CARE HOLDINGS LLC** f/k/a **BAYER CONSUMER CARE LLC** f/k/a **MSD CONSUMER CARE, INC.**, for its Dr. Scholl's line of products, may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a manufacturer of asbestos-containing Dr. Scholl's Foot Powder.

7. Defendant **BAYER HEALTHCARE LLC**, a subsidiary of **BAYER AG**, for its Dr. Scholl's line of products, may be served through its registered agent for service of process, Corporation Service Company d/b/a Lawyers Incorporating Service Company, 211 E. 7th Street, Suite 620, Austin, TX 78701-3218. This Defendant is being sued as a manufacturer of asbestos-containing Dr. Scholl's Foot Powder.

8. Although Defendant **BRENNNTAG NORTH AMERICA, INC.** (sued individually and as successor-in-interest to **MINERAL PIGMENT SOLUTIONS, INC.** and as successor-in-interest to **WHITTAKER CLARK & DANIELS, INC.**) has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said corporation may be served with process at its registered agent in Delaware, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. Defendant **BRENNNTAG NORTH AMERICA, INC.** (sued individually and as successor-in-interest to **MINERAL PIGMENT SOLUTIONS, INC.** and as successor-in-interest to **WHITTAKER CLARK & DANIELS, INC.**) may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a supplier of asbestos-containing talc.

9. Defendant **BRENNNTAG SPECIALTIES, LLC** f/k/a **BRENNNTAG SPECIALTIES, INC.** f/k/a **MINERAL PIGMENT SOLUTIONS, INC.** (sued individually and as successor-in-interest to **WHITTAKER CLARK & DANIELS, INC.**) may be served through its registered agent for service of process, CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, TX 75201-3140. This Defendant is being sued as a supplier of asbestos-containing talc.

10. Although Defendant **CLINIQUE LABORATORIES, INC.**, a subsidiary of THE ESTÉÉ LAUDER COMPANIES INC., has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said corporation may be served with process at its registered agent in New York, Corporation Service Company, 80 State Street, Albany, NY 12207. Defendant **CLINIQUE LABORATORIES, INC.**, a subsidiary of THE ESTÉÉ LAUDER COMPANIES INC., may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a manufacturer of asbestos-containing Clinique Eyeshadows.

11. Although Defendant **CLINIQUE LABORATORIES, LLC**, a subsidiary of THE ESTÉÉ LAUDER COMPANIES INC., has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said limited liability company may be served with process at its registered agent in Delaware, Corporation Service Company, 251 Little Falls Drive, Wilmington, DE 19808. Defendant **CLINIQUE LABORATORIES, LLC**, a subsidiary of THE ESTÉÉ LAUDER COMPANIES INC., may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a manufacturer of asbestos-containing Clinique Eyeshadows.

12. Although Defendant **COLOR TECHNIQUES, INC.** has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said corporation may be served with process at its registered agent in New Jersey, Salvatore Giampapa, 1202 Laurel Oak Road, Suite 205, Voorhies, NJ 08043. Defendant **COLOR TECHNIQUES, INC.** may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a supplier of asbestos-containing talc.

13. Although Defendant **COSMETIC SPECIALTIES, INC.** (sued individually and formerly d/b/a G&G SPECIALTY PRODUCTS CO.) for its Dr. Scholl's line of products, has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said corporation may be served with process at its registered agent in New Jersey, Ronald W. Grexa, 125 White Horse Pike, Haddon Heights, NJ 08035. Defendant **COSMETIC SPECIALTIES, INC.** (sued individually and formerly d/b/a G&G SPECIALTY PRODUCTS CO.) for its Dr. Scholl's line of products, may be served through the Secretary of State for the State of Texas. This Defendant is

being sued as a supplier of asbestos-containing talc, and as a manufacturer of asbestos-containing Dr. Scholl's Foot Powder.

14. Although Defendant **CROWN LABORATORIES, INC.** for its Desenex line of products, has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said corporation may be served with process at its registered agent in Delaware, Corporation Service Company, 251 Little Falls Drive, Wilmington, DE 19808. Defendant **CROWN LABORATORIES, INC.** for its Desenex line of products, may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a manufacturer of asbestos-containing Desenex Foot Powder.

15. Although Defendant **DR. SCHOLL'S LLC** has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said limited liability company may be served with process at its registered agent in Delaware, Corporation Service Company, 251 Little Falls Drive, Wilmington, DE 19808. Defendant **DR. SCHOLL'S LLC** may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a manufacturer of asbestos-containing Dr. Scholl's Foot Powder.

16. Although Defendant **ESTÉE LAUDER, INC.**, a subsidiary of THE ESTÉE LAUDER COMPANIES, INC. for its Clinique line of products, has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said corporation may be served with process at its registered agent in Delaware, The Prentice-Hall Corporation System, Inc., 251 Little Falls Drive, Wilmington, DE 19808. Defendant **ESTÉE LAUDER, INC.**, a subsidiary of THE ESTÉE LAUDER COMPANIES, INC. for its Clinique line of products, may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a manufacturer of asbestos-containing Clinique Eyeshadows.

17. Although Defendant **THE ESTÉE LAUDER COMPANIES, INC.** (sued individually and for Len-Ron Manufacturing Co. Inc.) for its Clinique line of products, has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said corporation may be served with process at its registered agent in Delaware, The Prentice-Hall

Corporation System, Inc., 251 Little Falls Drive, Wilmington, DE 19808. Defendant **THE ESTÉE LAUDER COMPANIES, INC.** (sued individually and for Len-Ron Manufacturing Co. Inc.) for its Clinique line of products, may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a manufacturer of asbestos-containing Clinique Eyeshadows.

18. Defendant **Fiesta Mart, L.L.C.** may be served through its registered agent for service of process, CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, TX 75201-3140. This Defendant is being sued as a supplier of asbestos-containing talcum powder and cosmetic products. This Defendant is a resident of the State of Texas.

19. Although Defendant **Fisons Corporation**, for its Desenex line of products, has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said corporation may be served with process at its registered agent in Massachusetts, Corporation Service Company, 84 State Street, Boston, MA 02109. Defendant **Fisons Corporation**, for its Desenex line of products, may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a manufacturer of asbestos-containing Desenex Foot Powder.

20. Although Defendant **GSK Consumer Health, Inc.** f/k/a NOVARTIS CONSUMER HEALTH INC. f/k/a CIBA SELF-MEDICATION, INC., for its Desenex line of products, has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said corporation may be served with process at its registered agent in Delaware, Corporation Service Company, 251 Little Falls Drive, Wilmington, DE 19808. Defendant **GSK Consumer Health, Inc.** f/k/a NOVARTIS CONSUMER HEALTH INC. f/k/a CIBA SELF-MEDICATION, INC., for its Desenex line of products, may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a manufacturer of asbestos-containing Desenex Foot Powder.

21. Although Defendant **L'OREAL USA, INC.** has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said corporation may be served with process at its registered agent in Delaware, The Prentice-Hall Corporation System, 251 Little Falls Drive, Wilmington, DE 19808. Defendant **L'OREAL USA, INC.** may be served through the Secretary of

State for the State of Texas. This Defendant is being sued as a manufacturer of asbestos-containing L’Oreal pressed face powder, L’Oreal blushes, and L’Oreal eyeshadows.

22. Although Defendant **MAYBELLINE LLC** has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said limited liability company may be served with process at its registered agent in New York, Corporation Service Company, 80 State Street, Albany, NY 12207. Defendant **MAYBELLINE LLC** may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a manufacturer of asbestos-containing Maybelline pressed face powder, Maybelline blushes, and Maybelline eyeshadows.

23. Defendant **MERCK & CO., INC.**, for its Dr. Scholl’s line of products, may be served through its registered agent for service of process, CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, TX 75201. This Defendant is being sued as a manufacturer of asbestos-containing Dr. Scholl’s Foot Powder.

24. Although Defendant **NOVARTIS CORPORATION** (sued individually and as a successor-in-interest to CIBA-GEIGY CORPORATION and its subsidiaries CIBA CONSUMER PHARMACEUTICALS and CIBA SELF-MEDICATION, INC.), for its Desenex line of products, has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said corporation may be served with process at its registered agent in New York, The Prentice Hall Corporation System, 80 State Street, Albany, NY 12207. Defendant **NOVARTIS CORPORATION** (sued individually and as a successor-in-interest to CIBA-GEIGY CORPORATION and its subsidiaries CIBA CONSUMER PHARMACEUTICALS and CIBA SELF-MEDICATION, INC.), for its Desenex line of products, may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a manufacturer of asbestos-containing Desenex Foot Powder.

25. Defendant **PFIZER INC.** may be served through its registered agent for service of process, CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, TX 75201. This Defendant is being sued as a supplier of asbestos-containing talc.

26. Although Defendant **PRESPERSE CORPORATION** has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said corporation may be served

with process at its registered agent in Delaware, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. Defendant **PRESPERSE CORPORATION** may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a supplier of asbestos-containing talc.

27. Although Defendant **PRESPERSE INTERNATIONAL CORP** has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said corporation may be served with process at its registered agent in New Jersey, CT Corporation System, 820 Bear Tavern Road, W. Trenton, NJ 08628. Defendant **PRESPERSE INTERNATIONAL CORP** may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a supplier of asbestos-containing talc.

28. Although Defendant **PTI UNION, LLC** a/k/a **PHARMA TECH INDUSTRIES**, for its Desenex line of products, has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said limited liability company may be served with process at its registered agent in Delaware, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. Defendant **PTI UNION, LLC** a/k/a **PHARMA TECH INDUSTRIES**, for its Desenex line of products, may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a manufacturer of asbestos-containing Desenex Foot Powder.

29. Although Defendant **REVLON CONSUMER PRODUCTS CORPORATION** has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said corporation may be served with process at its registered agent in Delaware, Corporate Creations Network Inc., 3411 Silverside Road, Tatnall Building, Suite 104, Wilmington, DE 19810. Defendant **REVLON CONSUMER PRODUCTS CORPORATION** may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a manufacturer of asbestos-containing Revlon pressed face powder, Revlon blushes and Revlon eyeshadows.

30. Although Defendant **SANOFI-AVENTIS U.S. LLC** (sued individually and as successor by merger to AVENTIS PHARMACEUTICALS INC.), for its Desenex line of products, has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said limited

liability company may be served with process at its registered agent in Delaware, Corporation Service Company, 251 Little Falls Drive, Wilmington, DE 19808. Defendant **SANOFI-AVENTIS U.S. LLC** (sued individually and as successor by merger to AVENTIS PHARMACEUTICALS INC.), for its Desenex line of products, may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a manufacturer of asbestos-containing Desenex Foot Powder.

31. Although Defendant **SCHOLL'S WELLNESS COMPANY LLC**, for its Dr. Scholl's line of products, has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said limited liability company may be served with process at its registered agent in Delaware, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. Defendant **SCHOLL'S WELLNESS COMPANY LLC**, for its Dr. Scholl's line of products, may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a manufacturer of asbestos-containing Dr. Scholl's Foot Powder.

32. Defendant **SPECIALTY MINERALS INC.** (sued individually and as a subsidiary of MINERALS TECHNOLOGIES INC.) may be served through its registered agent for service of process, CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, TX 75201. This Defendant is being sued as a supplier of asbestos-containing talc.

33. Although Defendant **WHITTAKER CLARK & DANIELS, INC.** has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said corporation may be served with process at its registered agent in New Jersey, Joe Cobuzio, Tompkins, McGuire, Wacenfeld, et al., 3 Becker Farm Road, 4th Floor, Roseland, NJ 07068. Defendant **WHITTAKER CLARK & DANIELS, INC.** may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a supplier of asbestos-containing talc.

34. This action is brought and these allegations are made pursuant to Tex. Civ. Prac. & Rem. Code § 71.031.

#### FACTUAL SUMMARY

35. Plaintiff ALVARO ALVARADO was wrongfully exposed to and inhaled or otherwise absorbed asbestos fibers, an inherently dangerous toxic substance, as described below:

Plaintiffs allege that Plaintiff ALVARO ALVARADO experienced exposure to asbestos through his regular and frequent personal use of Desenex Foot Powder from approximately 1990 to the late 2010s, Dr. Scholl's Foot Powder from approximately 1995 to 2001, and Johnson's Baby Powder from approximately 2006 to 2016. Plaintiff was also exposed to asbestos through Plaintiff MARIA DEL ROSARIO TOBIAS' regular and frequent use of Clinique eyeshadows from approximately 1990 to 1998, Maybelline face powders, Maybelline blushes, Maybelline eyeshadows, Revlon face powders, Revlon blushes, Revlon eyeshadows, L'Oreal face powders, L'Oreal blushes, and L'Oreal eyeshadows from approximately 2006 to the late 2010s, and Johnson's Baby Powder from approximately 2006 to 2016 while in close proximity to Plaintiff. Plaintiff was also exposed to asbestos during Plaintiffs' use of Johnson's Baby Powder on their daughter as an infant and small child from approximately 2006 to 2009. During these time periods, Plaintiff was also exposed to asbestos-containing talc supplied by Barretts Minerals Inc., Brenntag North America, Inc. (sued individually and as successor-in-interest to Mineral Pigment Solutions, Inc. and as successor-in-interest to Whittaker Clark & Daniels, Inc.), Brenntag Specialties, LLC f/k/a Brenntag Specialties, Inc. f/k/a Mineral Pigment Solutions, Inc. (sued individually and as successor-in-interest to Whittaker Clark & Daniels, Inc.), Color Techniques, Inc., Cosmetic Specialties, Inc. (sued individually and formerly d/b/a G&G Specialty Products Co.) for its Dr. Scholl's line of products, Pfizer Inc., Presperse Corporation, Presperse International Corp, Specialty Minerals Inc. (sued individually and as a subsidiary of Minerals Technologies Inc.), and Whittaker Clark & Daniels, Inc., and asbestos-containing talcum powder and cosmetics products supplied by Fiesta Mart, L.L.C. Plaintiff experienced these exposures at his personal residences in New Orleans, Louisiana and Dallas, Texas. Plaintiff ALVARO ALVARADO's regular and frequent personal use of Desenex Foot Powder, Dr. Scholl's Foot Powder, and Johnson's Baby Powder, Plaintiff MARIA DEL ROSARIO TOBIAS' regular and frequent use of Maybelline face powders, Maybelline blushes,

Maybelline eyeshadows, Revlon face powders, Revlon blushes, Revlon eyeshadows, L’Oreal face powders, L’Oreal blushes, L’Oreal eyeshadows, Johnson’s Baby Powder and Clinique eyeshadows while in close proximity to Plaintiff, and Plaintiffs’ regular and frequent use of Johnson’s Baby Powder on their daughter generated asbestos-containing dust and exposed Plaintiff ALVARO ALVARADO to respirable asbestos fibers. While Plaintiff MARIA DEL ROSARIO TOBIAS used asbestos-containing talcum powder and cosmetic products, dangerously high levels of asbestos fibers were released into the air at their personal residences. These fibers were frequently inhaled by Plaintiff ALVARO ALVARADO through contact with Plaintiff MARIA DEL ROSARIO TOBIAS.

**COUNT ONE**  
**ALLEGATIONS AGAINST TALC MANUFACTURING DEFENDANTS**

36. Plaintiffs allege that Plaintiff ALVARO ALVARADO was exposed to asbestos-containing products, and/or asbestos-containing talc, and/or other finished and unfinished asbestos-containing talcum powder products, and/or talc-containing cosmetics, and/or raw asbestos fiber of various kinds and grades through Plaintiff’s personal use of talcum powder products and Plaintiff MARIA DEL ROSARIO TOBIAS’ use of talcum powder products and talc-containing cosmetics while in close proximity to Plaintiff. Each Defendant corporation or its predecessors-in-interest is, or at times material hereto, has been engaged in the mining, processing and/or manufacturing, sale and distribution of asbestos-containing products, and/or asbestos-containing talc, and/or other finished and unfinished asbestos-containing talcum powder products, and/or talc-containing cosmetics, and/or raw asbestos fiber of various kinds and grades (hereinafter collectively referred to as “Defendants’ Products”). Plaintiffs would show that Plaintiff ALVARO ALVARADO was exposed, on numerous occasions, to Defendants’ Products which were produced and/or sold by Defendants and in so doing, inhaled great quantities of asbestos fibers. Further, Plaintiffs allege as more specifically set out below, that Plaintiff ALVARO ALVARADO has suffered injuries, illnesses, and disabilities proximately caused by his exposure to Defendants’ Products which were designed, manufactured and sold by Defendants. In that each exposure to Defendants’ Products caused or contributed to Plaintiff ALVARO ALVARADO’s injuries, illnesses and disabilities,

Plaintiffs say that the doctrine of joint and several liabilities should be extended to apply to each Defendant herein.

37. Plaintiff ALVARO ALVARADO was exposed to Defendants' Products that were manufactured, designed and/or distributed by the Defendants and/or their predecessors-in-interest through Plaintiff's personal use of Defendants' Products, and Plaintiff MARIA DEL ROSARIO TOBIAS' use of Defendants' Products while in close proximity to Plaintiff. Plaintiffs would show that the defective design and condition of Defendants' Products rendered said Products unreasonably dangerous, and that Defendants' Products were in this defective condition at the time they were designed by and/or left the hands of Defendants. Plaintiffs would show that Defendants' Products were defective in the manner in which they were marketed for their failure to contain or include adequate warnings regarding potential asbestos health hazards associated with the use of or the exposure to Defendants' Products, were defectively designed because they were more dangerous than would be contemplated by an ordinary user, the risks of Defendants' Products outweighed their benefits, and were defectively manufactured as they failed to comply with Defendants' own specifications and protect against asbestos exposure. Plaintiffs would show that this market defect rendered Defendants' Products unreasonably dangerous at the time they were designed or left the hands of the Defendants. Plaintiffs would show that Defendants are liable in product liability including, but not limited to, strict product liability for the above-described defects.

38. The Defendants are or were engaged in the business of selling, manufacturing, producing, designing and/or otherwise putting into the stream of commerce Defendants' Products, and those Products, without substantial change in the condition in which they were sold, manufactured, produced, designed and/or otherwise put into the stream of commerce, were a proximate and/or producing cause of the injuries, illnesses and disabilities of Plaintiff ALVARO ALVARADO.

39. Defendants knew that Defendants' Products would be used without inspection for defects and, by placing them on the market, represented that they would safely do the job for which they were intended, which must necessarily include the safe manipulation, personal use and/or handling of Defendants' Products.

40. Plaintiffs ALVARO ALVARADO and MARIA DEL ROSARIO TOBIAS were unaware of the hazards and defects in Defendants' Products which made them unsafe for purposes of manipulation, personal use and/or handling.

41. During the periods that Plaintiff ALVARO ALVARADO was exposed to Defendants' Products which were manufactured and sold by various Defendants, those Products were being utilized in a manner which was intended by Defendants.

42. In the event that Plaintiffs are unable to identify each of Plaintiff ALVARO ALVARADO's injurious exposures to Defendants' Products, Plaintiffs would show the Court that the Defendants named herein represent and/or represented a substantial share of the relevant market of Defendants' Products at all times material to this cause of action. Consequently, each Defendant should be held jointly and severally liable under the doctrines of enterprise liability, market-share liability, concert of action and alternative liability, among others.

43. The injuries, illnesses and disabilities of Plaintiff ALVARO ALVARADO are a direct and proximate result of the negligence of each Defendant and/or its predecessors-in-interest in that said entities produced, designed, sold and/or otherwise put into the stream of commerce Defendants' Products which the Defendants knew, or in the exercise of ordinary care should have known, were deleterious and highly harmful to Plaintiff's health and well-being. Certain Defendants created hazardous and deadly conditions to which Plaintiff was exposed and which caused Plaintiff to be exposed to a large amount of asbestos fibers. The Defendants were negligent in one, some and/or all of the following respects, among others, same being the proximate cause of Plaintiff's injuries, illnesses, and disabilities:

- (a) in failing to timely and adequately warn Plaintiffs and others of the dangerous characteristics and serious health hazards associated with exposure to Defendants' Products;
- (b) in failing to provide Plaintiffs and others with information as to what would be reasonably safe and sufficient wearing apparel and proper protective equipment, if in truth there were any, to protect Plaintiff ALVARO ALVARADO and others from being harmed and disabled by exposure to Defendants' Products;
- (c) in failing to place timely and adequate warnings on the containers of Defendants' Products or on Defendants' Products themselves to warn of the dangers to health of coming into contact with Defendants' Products;

- (d) in failing to take reasonable precautions or exercise reasonable care to publish, adopt and enforce a safety plan and/or safe method and manner of manipulation, personal use and/or handling of Defendants' Products;
- (e) in failing to develop and utilize a substitute material or design to eliminate asbestos fibers in Defendants' Products;
- (f) in failing to properly design and manufacture Defendants' Products for safe use under conditions of use that were reasonably anticipated;
- (g) in failing to properly test Defendants' Products before they were released for use; and
- (h) in failing to recall and/or remove Defendants' Products from the stream of commerce despite knowledge of the unsafe and dangerous nature of Defendants' Products.

**COUNT TWO**

**ALLEGATIONS AGAINST ASBESTOS-CONTAINING TALC SUPPLIER AND  
ASBESTOS-CONTAINING PRODUCT SUPPLIER DEFENDANTS**

44. All of the allegations contained in the previous paragraphs are realleged herein.

45. For all pertinent times, Defendants BARRETT'S MINERALS INC.; BRENNTAG NORTH AMERICA, INC. (sued individually and as successor-in-interest to MINERAL PIGMENT SOLUTIONS, INC. and as successor-in-interest to WHITTAKER CLARK & DANIELS, INC.), BRENNTAG SPECIALTIES, LLC f/k/a BRENNTAG SPECIALTIES, INC. f/k/a MINERAL PIGMENT SOLUTIONS, INC. (sued individually and as successor-in-interest to WHITTAKER CLARK & DANIELS, INC.), COLOR TECHNIQUES, INC., COSMETIC SPECIALTIES, INC. (sued individually and formerly d/b/a G&G SPECIALTY PRODUCTS CO.) for its Dr. Scholl's line of products, FIESTA MART, L.L.C., PFIZER INC., PRESUPERSE CORPORATION, PRESUPERSE INTERNATIONAL CORP, SPECIALTY MINERALS INC. (sued individually and as a subsidiary of MINERALS TECHNOLOGIES INC.), and WHITTAKER CLARK & DANIELS, INC. (hereinafter collectively referred to as "Supplier Defendants") individually sold, distributed, and supplied asbestos-containing products, and/or asbestos-containing talc, and/or other finished and unfinished asbestos-containing talcum powder products, and/or talc-containing cosmetics, and/or raw asbestos fiber of various kinds and grades (hereinafter collectively referred to as "Supplier Defendants' Products") that Plaintiff ALVARO ALVARADO came in contact with and inhaled, thereby causing his injuries, illnesses and disabilities.

46. Supplier Defendants as manufacturers, miners, shippers, distributors, and suppliers of Supplier Defendants' Products to various locations owned and/or operated by asbestos product manufacturers are liable to Plaintiffs for their failure to warn of the health hazards of exposure to asbestos and failure to design and package Supplier Defendants' Products so as to adequately protect and warn users and bystanders of the dangers of exposure to asbestos.

47. Further, Supplier Defendants are liable to Plaintiff ALVARO ALVARADO as professional vendors of Supplier Defendants' Products, and as such, because of the Defendants' size, volume of business and merchandising practices, knew or should have known of the defects of the Products they sold and/or supplied, and are strictly liable and negligent for failing to warn users and bystanders of potential health hazards from the use of said Products.

48. Further, Supplier Defendants made misrepresentations regarding the safety of asbestos to the asbestos-product manufacturers, thereby fraudulently inducing other sophisticated users to use Supplier Defendants' Products instead of other types. As such, Supplier Defendants are liable to Plaintiff ALVARO ALVARADO for his suffering and injuries from a disease caused by exposure to Supplier Defendants' Products because Supplier Defendants' fraudulent misrepresentations were detrimentally relied upon (1) by asbestos-product manufacturers incorporating raw asbestos fiber of various kinds and grades into Supplier Defendants' and others' finished Products and (2) by Plaintiff ALVARO ALVARADO who was exposed to Supplier Defendants' Products.

49. Finally, Supplier Defendants are liable to Plaintiffs because they knew or should have known that Supplier Defendants' Products which they sold and supplied were unreasonably dangerous in normal use, and their failure to communicate this information constitutes negligence. This negligence was the cause of Plaintiff ALVARO ALVARADO's illnesses, injuries and disabilities including, but not limited to, asbestos-related mesothelioma and other ill health effects.

**COUNT THREE**  
**CONSPIRACY ALLEGATIONS AGAINST ALL DEFENDANTS**

50. All of the allegations contained in the previous paragraphs are realleged herein.

51. Plaintiffs further allege that Defendants and/or their predecessors-in-interest knowingly agreed, contrived, combined, confederated and conspired among themselves and with other entities to cause Plaintiff ALVARO ALVARADO's illnesses, injuries and disabilities by exposing him to harmful and dangerous Defendants' Products. Defendants and other entities further

knowingly agreed, contrived, combined, confederated and conspired to deprive Plaintiffs ALVARO ALVARADO and MARIA DEL ROSARIO TOBIAS of the opportunity of informed free choice as to whether to use Defendants' Products or to expose Plaintiff ALVARO ALVARADO to said dangers. Defendants committed the above-described wrongs by willfully misrepresenting and suppressing the truth as to the risks and dangers associated with the use of and exposure to Defendants' Products.

52. In furtherance of said conspiracies, Defendants performed the following overt acts:

- (a) for many decades, Defendants individually, jointly, and in conspiracy with each other and other entities have been in possession of medical and scientific data, literature and test reports, which clearly indicated that the inhalation of asbestos dust and fibers resulting from the ordinary and foreseeable use of Defendants' Products was unreasonably dangerous, hazardous, deleterious to human health, carcinogenic, and potentially deadly;
- (b) despite the medical and scientific data, literature and test reports possessed by and available to Defendants, Defendants individually, jointly, and in conspiracy with each other and other entities fraudulently, willfully, and maliciously:
  - (1) withheld, concealed, and suppressed said medical and scientific data, literature and test reports regarding the risks of cancer, mesothelioma and other illnesses and diseases from Plaintiffs ALVARO ALVARADO and MARIA DEL ROSARIO TOBIAS who were using and Plaintiff ALVARO ALVARADO was being exposed to Defendants' Products;
  - (2) caused to be released, published and disseminated medical and scientific data, literature and test reports containing information and statements regarding the risks of cancer, mesothelioma and other illnesses and diseases, which Defendants knew were incorrect, incomplete, outdated and misleading; and
  - (3) distorted the results of medical examinations conducted upon individuals such as Plaintiff ALVARO ALVARADO, who was using or in close proximity to Defendants' Products and being exposed to

the inhalation of asbestos dust and fibers, by falsely stating and/or concealing the nature and extent of the harm to which Plaintiff and others such as Plaintiff have suffered.

- (c) Other conspirators participating in the conspiracy, or in ongoing or subsequent conspiracies (hereinafter called the “conspirators”), were member companies in the Quebec Asbestos Mining Association, and/or Asbestos Textile Institute, and/or the Cosmetic Toiletry and Fragrance Association (now Personal Care Products Council), and/or the Industrial Hygiene Foundation. Acting in concert, the conspirators fraudulently misrepresented to the public and public officials, *inter alia*, that asbestos did not cause cancer and that the disease mesothelioma had no association with pleural and pulmonary cancer and affirmatively suppressed information concerning the carcinogenic and other adverse effects of asbestos exposure on the human respiratory and digestive systems.
- (d) In addition, Defendants contrived, combined, confederated and conspired through a series of industry trade meetings and the creation of organizations such as the Air Hygiene Foundation (later the Industrial Hygiene Foundation) to establish authoritative standards for the control of industrial dusts which would act as a defense in personal injury lawsuits, despite knowing that compliance with such standards would not protect individuals such as Plaintiff ALVARO ALVARADO from contracting an asbestos-related disease or cancer.
- (e) In furtherance of said conspiracies, Defendants and/or their co-conspirators contributed to cause the establishment of a Threshold Limit Value for asbestos exposure, and contributed to the maintenance of such Threshold Limit Value despite evidence that this supposed “safe” level of exposure to asbestos would not protect the health of individuals such as Plaintiff ALVARO ALVARADO even if complied with.
- (f) As the direct and proximate result of the false and fraudulent representations, omissions and concealments set forth above, Defendants individually, jointly, and in conspiracy with each other intended to induce Plaintiffs ALVARO

ALVARADO and MARIA DEL ROSARIO TOBIAS to rely upon said false and fraudulent representations, omissions and concealments, and to continue to expose Plaintiff ALVARO ALVARADO to the dangers inherent in the use of and exposure to Defendants' Products, which caused the release of respirable asbestos fibers.

53. Plaintiffs reasonably and in good faith relied upon the false and fraudulent representations, omissions and concealments made by Defendants regarding the nature of Defendants' Products.

54. As a direct and proximate result of Plaintiffs' reliance on Defendants' false and fraudulent representations, omissions and concealments, Plaintiff ALVARO ALVARADO sustained damages including injuries, illnesses and disabilities and was deprived of the opportunity of informed free choice in connection with the use of and exposure to Defendants' Products.

**COUNT FOUR**  
**GROSS NEGLIGENCE/MALICE ALLEGATIONS AGAINST ALL DEFENDANTS**

55. All of the allegations contained in the previous paragraphs are realleged herein.

56. The actions and inactions of Defendants and their predecessors-in-interest, as specifically alleged hereinabove, whether taken separately or together, were of such a character as to constitute a pattern or practice of gross negligence, intentional wrongful conduct and/or malice resulting in damages and injuries to Plaintiff ALVARO ALVARADO. Defendants' conduct was specifically intended by Defendants to cause substantial injury to Plaintiff, or was carried out by Defendants with a conscious and flagrant disregard for the rights, safety and welfare of others and with actual awareness on the part of Defendants that the conduct would, in reasonable probability, result in human deaths and/or great bodily harm. More specifically, Defendants and their predecessors-in-interest consciously and/or deliberately engaged in oppression, fraud, willfulness, wantonness and/or malice with regard to Plaintiff ALVARO ALVARADO and should be held liable in punitive and exemplary damages to Plaintiffs.

**COUNT FIVE**  
**AIDING AND ABETTING ALLEGATIONS AGAINST ALL DEFENDANTS**

57. All of the allegations contained in the previous paragraphs are realleged herein.

58. The actions of all Defendants aided, abetted, encouraged, induced or directed the negligent and/or intentional acts of each and every other Defendant.

59. Each of the Defendants knew or should have known that its individual actions would combine to cause the injuries, illnesses and disabilities of Plaintiff ALVARO ALVARADO .

60. The actions of each of the Defendants is a proximate cause of Plaintiff ALVARO ALVARADO's injuries, illnesses and disabilities. As a result, all Defendants are jointly liable for the damage caused by their combined actions.

**COUNT SIX**  
**NEGLIGENCE PER SE ALLEGATIONS AGAINST ALL DEFENDANTS**

61. All of the allegations contained in the previous paragraphs are realleged herein.

62. The actions of all Defendants also constituted negligence per-se.

63. Each Defendant violated federal and state regulations relating to asbestos exposure. Such violations constitute negligence per-se or negligence as a matter of law. Further, each such violation resulted in dangerous and unlawful exposures to asbestos for Plaintiff ALVARO ALVARADO. Plaintiffs are not making any claims under federal law; instead, Plaintiffs are simply using the violation of federal standards as proof of liability on their state-law theories. Further, the reference to Federal regulations does not create a Federal question. See *Merrell Dow Pharmaceuticals, Inc. v. Thompson*, 478 U.S. 804 (1986). Any removal on this basis will be met with an immediate motion for remand and for sanctions.

64. The negligence per-se of each Defendant was a proximate cause of Plaintiff ALVARO ALVARADO's injuries, illnesses and disabilities.

**COUNT SEVEN**  
**(FRAUD AGAINST ALL DEFENDANTS)**

65. All of the allegations contained in the previous paragraphs are realleged herein.

66. **Fraudulent Misrepresentation:** All Defendants are liable for their fraudulent misrepresentations:

(a) First, each of these Defendants, via its employees, agents, advertisements, or any other authorized person or document, represented that certain facts were true when they were not, and made material representations that were false. The specific identities of these employees, agents, advertisements, or any other authorized person or document are maintained in Defendants' records. Such records remain in the exclusive control of Defendants pursuant to Defendants' respective document-retention policies. While Plaintiffs do not currently know all of the specific advertisements, or the names of all of the employees, agents, or any other authorized person who

made the representations, Plaintiffs will have access to this information once discovery has commenced and will be able to specifically name the advertisements as well as the employees, agents, or any other authorized persons.

(b) Second, Defendants represented that the asbestos-containing products they manufactured, supplied, or specified for use were not hazardous to humans. These representations, including material misrepresentations, were made before and during the years that Plaintiffs ALVARO ALVARADO and MARIA DEL ROSARIO TOBIAS purchased, used, and Plaintiff ALVARO ALVARADO was exposed to asbestos from Defendants' asbestos-containing talc, asbestos-containing talcum powder products, and asbestos-containing cosmetic products. Such material representations were made either directly to Plaintiffs or to a third party intending and reasonably expecting that the substance of those material representations would be repeated to Plaintiffs.

(c) Third, Defendants knew that the material representations were false when they made them, or they made the material representations recklessly and without regard for their truth. Defendants material representations and conduct were false statements and material representations of fact.

(d) Fourth, Defendants intended that Plaintiffs ALVARO ALVARADO and MARIA DEL ROSARIO TOBIAS, and/or the same class of persons as Plaintiffs rely and act on the material representations or their substance.

(e) Fifth, Plaintiffs ALVARO ALVARADO and MARIA DEL ROSARIO TOBIAS reasonably relied on Defendants' material and false representations or the substance of these material and false representations.

(f) Sixth, Plaintiff ALVARO ALVARADO developed mesothelioma.

(g) Seventh, Plaintiffs ALVARO ALVARADO's and MARIA DEL ROSARIO TOBIAS' justifiable reliance on those material representations was a substantial factor in causing Plaintiff ALVARO ALVARADO's mesothelioma and the resulting damages thereto.

67. **Conspiracy to Commit Fraudulent Misrepresentation:** Plaintiffs hereby incorporate by reference the allegations of Paragraph 66 of this Seventh Cause of Action as if fully stated herein. All Defendants are liable for their conspiracy to commit fraudulent material misrepresentation:

(a) First, Defendants were aware that their conspirators, which included all co-Defendants and others, planned to commit fraudulent material misrepresentation against Plaintiff ALVARO ALVARADO, and/or the same class of persons as Plaintiff.

(b) Second, Defendants agreed with their conspirators and intended that the false and fraudulent material misrepresentation, including material misrepresentations of fact, be committed.

(c) Third, Plaintiff ALVARO ALVARADO developed mesothelioma.

(d) Fourth, each Defendant's participation in the conspiracy was a substantial factor in causing Plaintiff's mesothelioma and the resulting damages thereto.

68. **Knowledge of Hazards:** At all times pertinent hereto, all Defendants owed Plaintiff ALVARO ALVARADO a duty, as provided for in Restatement (Second) of Torts §525-551, to abstain from injuring his person, property, or rights. In violation of that duty, these Defendants, and each of them, did do the acts and omissions, when a duty to act was imposed as set forth herein, thereby proximately causing injury to Plaintiff. Such acts and omissions consisted of acts falling within Restatement (Second) of Torts §525-551, and more specifically were (i) suggestions of material facts which were not true and which the Defendants did not believe to be true, (ii) assertions of material facts of that which were not true, which the Defendants had no reasonable ground for believing to be true, and (iii) the suppression of material facts when a duty existed to disclose them, all as are more fully set forth herein, and the violation of which as to any one such item gave rise to a cause of action for violation of Plaintiffs' rights as provided for in the aforementioned Restatement (Second) of Torts §525-551.

69. Since 1924, all of the Defendants have known and possessed of the true material facts (consisting of medical and scientific data and other knowledge) which clearly indicated that the asbestos-containing talc, asbestos-containing talcum powder products, and asbestos-containing cosmetics referred to herein were hazardous to the health and safety of Plaintiff ALVARO ALVARADO and others similarly situated. Defendants engaged in the following acts and omissions:

(a) Did not label any of the aforementioned asbestos-containing products as to the hazards of said products to the health and safety of Plaintiff ALVARO ALVARADO, and others in Plaintiffs' positions using and Plaintiff being exposed to said products when the knowledge of such hazards was existing and known to Defendants, and each of them, since 1924. By not labeling Defendants' asbestos-containing products as to their said hazards, Defendants, and each of them,

caused to be suggested as a fact to Plaintiffs that it was safe for them to use said products, when in fact these things were not true and Defendants did not believe them to be true.

(b) Suppressed information relating to the danger of using the asbestos-containing talc, asbestos-containing talcum powder products, and asbestos-containing cosmetics by requesting the suppression of information to Plaintiffs, Plaintiffs' class of persons, and the general public concerning the dangerous nature of the aforementioned products to all persons, including users, bystanders and household members, by not allowing such information to be disseminated in a manner which would give general notice to the public and knowledge of the hazardous nature thereof when Defendants were bound to disclose such information.

(c) Sold the aforementioned asbestos-containing products to the public, including Plaintiffs and others in Texas and other states without advising them of the dangers of use of said products and dangers to those persons' household members, when Defendants knew of such dangers as set forth herein and above, and had a duty to disclose such dangers. Thus, Defendants caused to be positively asserted to Plaintiffs and the public that which was not true and which Defendants had no reasonable ground for believing to be true, in a manner not warranted by the information possessed by said Defendants, and each of them, of that which was and is not true, to wit, that it was safe for Plaintiffs to use said products and that they did not pose a risk of harm to Plaintiff ALVARO ALVARADO .

(d) Suppressed and continue to suppress from everyone, including Plaintiffs, medical, scientific data, and knowledge of the accurate results of studies including, but not limited to, Waldemar C. Dreesen of the United States Public Health Service's 1933 report to the National Safety Council, the results of a study conducted among tremolite, talc and slate workers. The study indicated that the talc was a hydrous calcium magnesium silicate, being 45% talc and 45% tremolite, and the National Safety Council stated "The results of the study seemed to indicate a relationship between the amount of dust inhaled and the effect of this dust on the lungs of the workers." As early as 1934, the National Safety Council was publishing information stating that "a cause of severe pulmonary injury is asbestos, a silicéte of magnesium." In the September 1935 issue of National Safety News, an article entitled *No Halfway Measures in Dust Control* by Arthur S. Johnson reported lowered lung capacity resulting from "mesothelioma" and "similar conditions" that developed "from exposure to excess of many mineral dusts relatively low in free silica content." The article further noted that claims for disabilities from workers who alleged exposure to "clay, talc,

emery, and carborundum dusts" had "claims prosecuted successfully." The article concluded that "[i]n the absence of adequate diagnoses, occupational histories and a more satisfactory method of adjudicating claims than prosecution at common law, we must conclude that it is necessary to find a practical method for controlling all mineral dusts."

(e) Belonged to, participated in, and financially supported the Industrial Hygiene Foundation, Asbestos Information Association, the Asbestos Textile Institute (ATI), the Cosmetic, Toiletry, and Fragrance Association (now known as the Personal Care Products Council), and other industry organizations which actively promoted the suppression of information of danger to users of asbestos-containing talc and asbestos-containing talcum powder products for and on behalf of Defendants, and each of them, thereby misleading Plaintiffs to their prejudice through the suggestions and deceptions set forth above in this cause of action. ATI's Dust Control Committee, which changed its name to the Air Hygiene Committee of ATI, was specifically enjoined to study the subject of dust control; discussions in such committee were held many times of (i) the dangers inherent in asbestos and the dangers which arise from the lack of control of dust and (ii) the suppression of such information from 1946 to a date unknown to Plaintiffs at this time.

(f) Knew and possessed medical and scientific information of the connection between inhalation of asbestos fibers and mesothelioma in 1930 with the study of mine and mill workers at the Thetford asbestos mines in Quebec, Canada, and the study of workers at Raybestos-Manhattan plants in Manheim and Charleston, South Carolina. This information was disseminated through the ATI and other industry organizations to all other Defendants, and each of them herein. Between 1942 and 1950, Defendants, and each of them, knew and possessed medical and scientific information of the connection between inhalation of asbestos fibers and cancer, which information was disseminated through the ATI and other industry organizations to all other Defendants herein. Thereby, Defendants suggested as fact that which is not true and disseminated other facts likely to and did mislead Plaintiffs for want of communication of true facts, which consisted of the previously described medical and scientific data and other knowledge by not giving Plaintiffs the true facts concerning such knowledge of danger, when Defendants were bound to disclose them.

(g) Failed to warn Plaintiffs and others similarly situated regarding the nature of Defendants' asbestos-containing talc, asbestos-containing talcum powder products, and asbestos-containing cosmetics. In 1968, a study presented at the American Industrial Hygiene Conference and published in the American Industrial Hygiene Association Journal concluded that "[all] of the 22

talcum products analyzed have a... fiber content... averaging 19%. The fibrous-material was predominantly talc but contained minor amounts of tremolite, anthophyllite, and chrysotile as these are often present in fibrous talc mineral deposits. Unknown significant amounts of such materials in products that may be used without precautions may create an unsuspected problem." [Cralley, L.J., et al.; *Fibrous and Mineral Content of Cosmetic Talcum Products*, 29 Ant Ind. Hyg. Assoc. J.350 (1968).] Defendants failed to warn Plaintiffs and others similarly situated that their asbestos-containing talc, asbestos-containing talcum powder products, and asbestos-containing cosmetics are, among other things, dangerous when breathed and cause pathological effects without noticeable trauma, although Defendants possessed knowledge that such products were dangerous and a threat to the health of persons coming into contact therewith and under a duty to disclose it.

(h) Concealed from Plaintiff ALVARO ALVARADO and others similarly situated the true nature of their exposure, the fact that Defendants knew that exposure to respirable asbestos meant that Plaintiff ALVARO ALVARADO would inhale this asbestos, significantly increasing his risk of developing mesothelioma, lung cancer, and mesothelioma; that Plaintiff had in fact been exposed to respirable asbestos; that the materials to which Plaintiff was exposed would cause pathological effects in the human body without noticeable or perceptible trauma to warn him of injury; and Defendants engaged in these acts and omissions while under a duty to and bound to disclose this information.

(i) Failed to provide information to the public at large and buyers, users and physicians of Plaintiff ALVARO ALVARADO for the purpose of conducting physical examinations of anyone who came in contact with asbestos as to the true nature of the hazards of asbestos, in order for such physicians to diagnose and treat individuals coming into contact with asbestos, in that the materials to which Plaintiff had been exposed would cause pathological effects without noticeable trauma, even though Defendants were under a duty to supply such information and such failure was and is likely to mislead persons, including Plaintiff, as to the dangers and risk of harm to which they were exposed.

(j) Affirmatively misrepresented that their asbestos-containing talc, asbestos-containing talcum powder products and asbestos-containing cosmetics were safe to use and handle, when Defendants knew such statements were false when made, or made said false statements recklessly and without regard for whether the statements were true.

70. Each of the foregoing acts, suggestions, assertions, and forbearances to act when a duty existed to act, the said Defendants and each of them, having such knowledge, knowing Plaintiffs did not have such knowledge and Plaintiff ALVARO ALVARADO would breathe the asbestos-containing talc, asbestos-containing talcum powder products, and asbestos-containing cosmetics innocently, was done falsely and fraudulently and with full intent to induce Plaintiff to be in a dangerous environment and to cause him to remain unaware of the true facts, all in violation of Restatement (Second) of Torts §525-551.

**COUNT EIGHT**  
**BASIS FOR PUNITIVE DAMAGES**

71. All of the allegations contained in the previous paragraphs are realleged herein.

72. **Malice, Oppression, and Fraud:** Plaintiffs hereby incorporate by reference the allegations of all causes of action as if fully stated herein. All Defendants are liable for punitive damages because they engaged in the conduct that caused Plaintiffs harm with malice, oppression, or fraud.

(a) First, Defendants committed malice in that they acted with intent to harm when they caused Plaintiff ALVARO ALVARADO's asbestos exposures, and because their conduct was despicable and was done with a willful and knowing disregard of the rights and safety of others.

(b) Second, these Defendants committed oppression in that their conduct was despicable and subjected Plaintiff ALVARO ALVARADO to cruel and unjust hardship and knowingly disregarded his rights.

(c) Third, the Defendants committed fraud in that they intentionally and fraudulently concealed and misrepresented material facts and did so intending to harm Plaintiff, or with reckless disregard for whether their fraud would harm Plaintiff.

73. These Defendants' conduct constituting malice, oppression, and fraud was committed by, authorized by, and adopted by one or more officers, directors, and managing agents within the corporate hierarchy of each Defendant, who acted on behalf of each Defendant.

74. As a direct and proximate result of such intentional conduct by Defendants, their "alternate entities", and each of them, Plaintiff ALVARO ALVARADO sustained the injuries, illnesses, disabilities, and damages alleged herein.

## DAMAGES

75. The conduct of Defendants, as alleged hereinabove, was a direct, proximate and producing cause of the damages resulting from the asbestos-related disease of Plaintiff ALVARO ALVARADO, and of the following general and special damages including:

- (a) Damages to punish Defendants for proximately causing Plaintiff ALVARO ALVARADO's untimely injuries, illnesses, and disabilities;
- (b) Physical pain and mental anguish sustained by Plaintiff ALVARO ALVARADO in the past;
- (c) Physical pain and mental anguish that Plaintiff ALVARO ALVARADO, in reasonable probability, will sustain in the future;
- (d) The past disfigurement suffered by Plaintiff ALVARO ALVARADO ;
- (e) The future disfigurement that Plaintiff ALVARO ALVARADO will, in reasonable probability, sustain in the future;
- (f) The physical impairment sustained by Plaintiff ALVARO ALVARADO in the past;
- (g) The physical impairment that Plaintiff ALVARO ALVARADO will, in reasonably probability, sustain in the future;
- (h) Medical expenses incurred by Plaintiff ALVARO ALVARADO in the past;
- (i) The medical expenses that Plaintiff ALVARO ALVARADO will, in reasonable probability, sustain in the future;
- (j) Plaintiff ALVARO ALVARADO's lost earning capacity sustained in the past;
- (k) Loss of household services sustained by Plaintiff MARIA DEL ROSARIO TOBIAS in the past;
- (l) The loss of household services that, in reasonable probability, Plaintiff MARIA DEL ROSARIO TOBIAS will sustain in the future;
- (m) The loss of consortium sustained by Plaintiff MARIA DEL ROSARIO TOBIAS in the past;
- (n) The loss of consortium that, in reasonable probability, Plaintiff MARIA DEL ROSARIO TOBIAS will sustain in the future.
- (o) Plaintiffs seek punitive and exemplary damages.

(p) Any and all other recoverable personal injury, survival, and/or wrongful death damages for Plaintiffs and Plaintiffs' heirs.

76. By their acts and omissions described herein, Defendants intentionally, knowingly and/or recklessly caused serious bodily injury to Plaintiff ALVARO ALVARADO within the meaning of Tex.Civ.Prac.& Rem. Code §41.008(c)(7) and Tex. Penal Code §22.04.

77. Plaintiffs filed suit within two (2) years of Defendants' wrongdoing, which Defendants had and continue to wrongfully conceal.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs demand judgment against the Defendants, and each of them, jointly and severally, for general damages, for their costs expended herein, for interest on said judgment from the date this action accrued until paid, at the legal rate, and for such other and further relief, both at law and in equity, to which Plaintiffs may show themselves justly entitled.

**JURY DEMAND**

Plaintiffs demand that all issues of fact in this case be tried to a properly impaneled jury.

Respectfully submitted,

**SIMON GREENSTONE PANATIER, PC**

/s/ Jennifer Montemayor

JENNIFER MONTEMAYOR  
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**ATTORNEYS FOR PLAINTIFFS**

**AFFIDAVIT OF SERVICE**

**State of Texas**

**County of Dallas**

**160th Judicial District Court**

Case Number: DC-21-07664

Plaintiff:

**Alvaro Alvarado and Maria Del Rosario Tobias**

vs.

Defendant:

**Aventis, Inc.; et al**

For:

Jennifer I. Montemayor  
1201 Elm Street  
Suite 3400  
Dallas, TX 75270

Received by Mike Techow on the 13th day of July, 2021 at 3:46 pm to be served on **Aventis, Inc. c/o Texas Secretary of State, 1019 Brazos Street, Austin, Travis County, TX 78701**.

I, Mike Techow, being duly sworn, depose and say that on the **14th day of July, 2021 at 3:15 pm**, I:

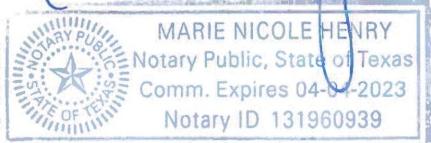
delivered to **REGISTERED AGENT** by delivering a true copy of the **Two Copies of Citation and Plaintiff's First Amended Complaint and Jury Demand with \$55.00 Texas Secretary of State Fee** with the date of service endorsed thereon by me, to: **Michelle Robinson, Texas Secretary of State as Authorized Agent** at the address of: **1019 Brazos Street, Austin, Travis County, TX 78701** on behalf of **Aventis, Inc.**, and informed said person of the contents therein, in compliance with state statutes.

**Description of Person Served:** Age: 45, Sex: F, Race/Skin Color: White, Height: 5'11", Weight: 175, Hair: Blonde, Glasses: N

My name is Mike Techow. My date of birth is 6/26/1972. My work address is 809 Nueces, Austin, TX 78701. I declare under penalty of perjury that the foregoing is true and correct. Executed in Travis County on July 14th, 2021 by Mike Techow, declarant.

Subscribed and Sworn to before me on the 14th day of July, 2021 by the affiant who is personally known to me.

*Marie Nicole Henry*  
NOTARY PUBLIC



*Mike Techow*  
\_\_\_\_\_  
Mike Techow  
PSC-1215, Exp. 7/31/2022

On Time Couriers/Process  
1700 Pacific Avenue  
Ste 1040  
Dallas, TX 75201  
(214) 740-9999

Our Job Serial Number: ONT-2021003448  
Ref: Alvaro Alvarado

**FORM NO. 3534 CITATION**

**THE STATE OF TEXAS**

**To:** AVENTIS INC.  
BY SERVING THE SECRETARY OF STATE  
OFFICE OF THE SECRETARY OF STATE  
CITATIONS UNIT - P.O. BOX 12079  
AUSTIN, TX, 78711

**GREETINGS:**

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **160th District Court** at 600 Commerce Street, Dallas Texas, 75202.

Said PLAINTIFF being ALVARO ALVARADO AND MARIA LLANES

Filed in said Court on the **16th day of June, 2021** against

AVENTIS INC., BAYER CONSUMER CARE HOLDINGS LLC F/K/A BAYER CONSUMER CARE LLC F/K/A MSD CONSUMER CARE, INC., BAYER HEALTHCARE LLC, A SUBSIDIARY OF BAYER AG, BRENNETAG NORTH AMERICA, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO MINERAL PIGMENT SOLUTIONS, INC. AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), BRENNETAG SPECIALTIES, LLC F/K/A BRENNETAG SPECIALTIES, INC. F/K/A MINERAL PIGMENT SOLUTIONS, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), CLINIQUE LABORATORIES, INC., A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., CLINIQUE LABORATORIES, LLC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., COLOR TECHNIQUES, INC, COSMETIC SPECIALTIES, INC. (SUED INDIVIDUALLY AND FORMERLY D/B/A G&G SPECIALTY PRODUCTS CO.), CROWN LABORATORIES, INC, DR. SCHOLL'S LLC, ESTEE LAUDER, INC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES, INC, THE ESTEE LAUDER COMPANIES, INC. (SUED INDIVIDUALLY AND FOR LEN-RON MANUFACTURING CO. INC.), FIESTA MART, L.L.C., FISONS CORPORATION, GSK CONSUMER HEALTH, INC. F/K/A NOVARTIS CONSUMER HEALTH INC. F/K/A CIBA SELF-MEDICATION, INC. L'OREAL USA, INC., MAYBELLINE LLC, MERCK & CO., INC., NOVARTIS CORPORATION (SUED INDIVIDUALLY AND AS A SUCCESSOR-IN-INTEREST TO CIBA-GEIGY CORPORATION AND ITS SUBSIDIARIES CIBA CONSUMER PHARMACEUTICALS AND CIBA SELF-MEDICATION, INC.), PFIZER INC., PRESPERSE CORPORATION, PRESPERSE INTERNATIONAL CORP, PTI UNION, LLC A/K/A PHARMA TECH INDUSTRIES, REVOL CONSUMER PRODUCTS CORPORATION, SANOFI-AVENTIS U.S. LLC (SUED INDIVIDUALLY AND AS SUCCESSOR BY MERGER TO AVENTIS PHARMACEUTICALS INC.), SCHOLL'S WELLNESS COMPANY LLC, SPECIALTY MINERALS INC., (SUED INDIVIDUALLY AND AS A SUBSIDIARY OF MINERALS TECHNOLOGIES INC.), WHITTAKER CLARK & DANIELS, INC.

For suit, said suit being numbered **DC-21-07664** the nature of which demand is as follows: **Suit On OTHER (CIVIL) etc.**

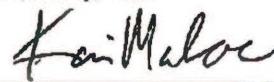
as shown on said petition a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office **on this the 18th day of June, 2021**

ATTEST: FELICIA PITRE Clerk of the District Courts of Dallas, County, Texas

By

  
KARI MALONE

, Deputy



**ESERVE (SOS)**

**CITATION**

No.: **DC-21-07664**

**ALVARO ALVARADO, et al**

vs.

**AVENTIS INC., et al**

**ISSUED  
ON THIS THE 18TH DAY  
OF JUNE, 2021**

FELICIA PITRE  
Clerk District Courts,  
Dallas County, Texas

By KARI MALONE, Deputy

Attorney for : Plaintiff  
**JENNIFER MONTEMAYOR**  
1201 Elm Street, Suite 3400  
Dallas, Texas 75270  
214-276-7680  
[jmontemayor@sgptrial.com](mailto:jmontemayor@sgptrial.com)

**DALLAS COUNTY  
SERVICE FEES  
NOT PAID**

Cause No. DC-21-07664  
Court No: 160th District Court

Style: ALVARO ALVARADO, et al  
vs.  
AVENTIS INC., et al

**OFFICER'S RETURN  
FOR INDIVIDUALS**

**AFFIDAVIT  
ATTACHED**

Received this Citation the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock. Executed at \_\_\_\_\_, within the County of \_\_\_\_\_, State of \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock, by \_\_\_\_\_ delivering to the within named \_\_\_\_\_ each in person, a copy of this Citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

-----000000-----  
**OFFICER'S RETURN  
FOR CORPORATIONS**

Received this Citation the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_ M. Executed at \_\_\_\_\_, within the County of \_\_\_\_\_, State of \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock \_\_\_\_ M. by summoning the within named Corporation, \_\_\_\_\_

President - Vice President - Registered Agent - in person, of the said

a true copy of this citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

-----000000-----

The distance actually traveled by me in serving such process was \_\_\_\_\_ miles and my fees are as follows: To certify which witness by my hand.

For Serving Citation \$ \_\_\_\_\_

Sheriff \_\_\_\_\_

For Mileage \$ \_\_\_\_\_

County of \_\_\_\_\_

For Notary \$ \_\_\_\_\_

State of \_\_\_\_\_

Total Fees \$ \_\_\_\_\_

By \_\_\_\_\_

(Must be verified if served outside the State of Texas)

State of \_\_\_\_\_

County of \_\_\_\_\_

Signed and sworn to me by the said \_\_\_\_\_ before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, to certify which witness my hand and seal of office.

Seal

State & County of \_\_\_\_\_

Case 3:21-cv-01850-S Document 1-2 Filed 08/09/21 Page 157 of 183 PageID 171  
**AFFIDAVIT OF SERVICE**

State of Texas

County of Dallas

160th Judicial District Court

Case Number: DC-21-07664

Plaintiff:

**Alvaro Alvarado and Maria Del Rosario Tobias**

vs.

Defendant:

**Aventis, Inc.; et al**

For:

Jennifer I. Montemayor  
1201 Elm Street  
Suite 3400  
Dallas, TX 75270

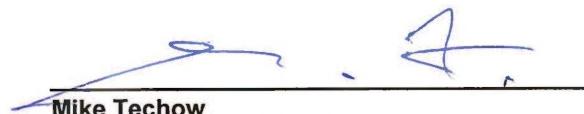
Received by Mike Techow on the 13th day of July, 2021 at 4:07 pm to be served on **Bayer Consumer Care Holdings LLC f/k/a Bayer Consumer Care LLC f/k/a MSD Consumer Care, Inc. c/o Texas Secretary of State, 1019 Brazos Street, Austin, Travis County, TX 78701**.

I, Mike Techow, being duly sworn, depose and say that on the 14th day of July, 2021 at 3:15 pm, I:

delivered to **REGISTERED AGENT** by delivering a true copy of the **Two Copies of Citation and Plaintiff's First Amended Complaint and Jury Demand with \$55.00 Texas Secretary of State Fee** with the date of service endorsed thereon by me, to: **Michelle Robinson, Texas Secretary of State as Authorized Agent** at the address of: **1019 Brazos Street, Austin, Travis County, TX 78701** on behalf of **Bayer Consumer Care Holdings LLC f/k/a Bayer Consumer Care LLC f/k/a MSD Consumer Care, Inc.**, and informed said person of the contents therein, in compliance with state statutes.

**Description of Person Served:** Age: 45, Sex: F, Race/Skin Color: White, Height: 5'11", Weight: 175, Hair: Blonde, Glasses: N

My name is Mike Techow. My date of birth is 6/26/1972. My work address is 809 Nueces, Austin, TX 78701. I declare under penalty of perjury that the foregoing is true and correct. Executed in Travis County on July 14th, 2021 by Mike Techow, declarant.



Mike Techow  
PSC-1215, Exp. 7/31/2022

On Time Couriers/Process  
1700 Pacific Avenue  
Ste 1040  
Dallas, TX 75201  
(214) 740-9999

Our Job Serial Number: ONT-2021003449  
Ref: Alvaro Alvarado



**FORM NO. 3534 CITATION  
THE STATE OF TEXAS**

**To: BAYER CONSUMER CARE HOLDINGS LLC F/K/A BAYER CONSUMER CARE LLC F/K/A MSD CONSUMER CARE, INC.)  
BY SERVING THE SECRETARY OF STATE  
OFFICE OF THE SECRETARY OF STATE  
CITATIONS UNIT - P.O. BOX 12079  
AUSTIN, TX, 78711**

**GREETINGS:**

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **160th District Court** at 600 Commerce Street, Dallas Texas, 75202.

Said PLAINTIFF being **ALVARO ALVARADO AND MARIA LLANES**

Filed in said Court on the **16th day of June, 2021** against

**AVENTIS INC., BAYER CONSUMER CARE HOLDINGS LLC F/K/A BAYER CONSUMER CARE LLC F/K/A MSD CONSUMER CARE, INC., BAYER  
HEALTHCARE LLC, A SUBSIDIARY OF BAYER AG, BRENNETAG NORTH AMERICA, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-  
INTEREST TO MINERAL PIGMENT SOLUTIONS, INC. AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.),  
BRENNETAG SPECIALTIES, LLC F/K/A BRENNETAG SPECIALTIES, INC. F/K/A MINERAL PIGMENT SOLUTIONS, INC. (SUED INDIVIDUALLY  
AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), CLINIQUÉ LABORATORIES, INC., A SUBSIDIARY OF THE  
ESTEE LAUDER COMPANIES INC., CLINIQUÉ LABORATORIES, LLC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., COLOR  
TECHNIQUES, INC., COSMETIC SPECIALTIES, INC. (SUED INDIVIDUALLY AND FORMERLY D/B/A G&G SPECIALTY PRODUCTS CO.),  
CROWN LABORATORIES, INC, DR. SCHOLL'S LLC, ESTEE LAUDER, INC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES, INC, THE  
ESTEE LAUDER COMPANIES, INC. (SUED INDIVIDUALLY AND FOR LEN-RON MANUFACTURING CO. INC.), FIESTA MART, L.L.C., FISONS  
CORPORATION, GSK CONSUMER HEALTH, INC. F/K/A NOVARTIS CONSUMER HEALTH INC. F/K/A CIBA SELF-MEDICATION, INC.  
L'OREAL USA, INC., MAYBELLINE LLC, MERCK & CO., INC., NOVARTIS CORPORATION (SUED INDIVIDUALLY AND AS A SUCCESSOR-IN-  
INTEREST TO CIBA-GEIGY CORPORATION AND ITS SUBSIDIARIES CIBA CONSUMER PHARMACEUTICALS AND CIBA SELF-MEDICATION,  
INC.), PFIZER INC., PRESPERSE CORPORATION, PRESPERSE INTERNATIONAL CORP, PTI UNION, LLC A/K/A PHARMA TECH INDUSTRIES,  
REVOL CONSUMER PRODUCTS CORPORATION, SANOFI-AVENTIS U.S. LLC (SUED INDIVIDUALLY AND AS SUCCESSOR BY MERGER TO  
AVENTIS PHARMACEUTICALS INC.), SCHOLL'S WELLNESS COMPANY LLC, SPECIALTY MINERALS INC., (SUED INDIVIDUALLY AND AS A  
SUBSIDIARY OF MINERALS TECHNOLOGIES INC.), WHITTAKER CLARK & DANIELS, INC.**

For suit, said suit being numbered **DC-21-07664** the nature of which demand is as follows: **Suit On OTHER (CIVIL) etc.**

as shown on said petition a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

**WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.**

Given under my hand and the Seal of said Court at office **on this the 18th day of June, 2021**

ATTEST: FELICIA PITRE Clerk of the District Courts of Dallas, County, Texas

By Kari Malone, Deputy  
**KARI MALONE**



**ESERVE (SOS)**

**CITATION**

No.: **DC-21-07664**

**ALVARO ALVARADO, et al**

**vs.**

**AVENTIS INC., et al**

**ISSUED  
ON THIS THE 18TH DAY  
OF JUNE, 2021**

**FELICIA PITRE**  
Clerk District Courts,  
Dallas County, Texas

By **KARI MALONE**, Deputy

Attorney for : Plaintiff  
**JENNIFER MONTEMAYOR**  
1201 Elm Street, Suite 3400  
Dallas, Texas 75270  
214-276-7680  
[jmontemayor@sgptrial1.com](mailto:jmontemayor@sgptrial1.com)

**DALLAS COUNTY  
SERVICE FEES  
NOT PAID**

Cause No. DC-21-07664  
Court No: 160th District Court

Style: ALVARO ALVARADO, et al  
vs.  
AVENTIS INC., et al

**OFFICER'S RETURN  
FOR INDIVIDUALS**

**AFFIDAVIT  
ATTACHED**

Received this Citation the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock. Executed at \_\_\_\_\_, within the County of \_\_\_\_\_, State of \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock, by delivering to the within named \_\_\_\_\_ each in person, a copy of this Citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

-----000000-----  
**OFFICER'S RETURN  
FOR CORPORATIONS**

Received this Citation the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_M. Executed at \_\_\_\_\_, within the County of \_\_\_\_\_, State of \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock \_\_\_\_M. by summoning the within named Corporation,

President - Vice President - Registered Agent - in person, of the said

a true copy of this citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

-----000000-----

The distance actually traveled by me in serving such process was \_\_\_\_\_ miles and my fees are as follows: To certify which witness by my hand.

For Serving Citation \$ \_\_\_\_\_ Sheriff \_\_\_\_\_

For Mileage \$ \_\_\_\_\_ County of \_\_\_\_\_

For Notary \$ \_\_\_\_\_ State of \_\_\_\_\_

Total Fees \$ \_\_\_\_\_ By \_\_\_\_\_

(Must be verified if served outside the State of Texas)

State of \_\_\_\_\_

County of \_\_\_\_\_

Signed and sworn to me by the said \_\_\_\_\_ before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, to certify which witness my hand and seal of office.

Seal

State & County of \_\_\_\_\_

AFFIDAVIT OF SERVICE

State of Texas

County of Dallas

160th Judicial District Court

Case Number: DC-21-07664

Plaintiff:

**Alvaro Alvarado and Maria Del Rosario Tobias**

vs.

Defendant:

**Aventis, Inc.; et al**

For:

Jennifer I. Montemayor  
1201 Elm Street  
Suite 3400  
Dallas, TX 75270

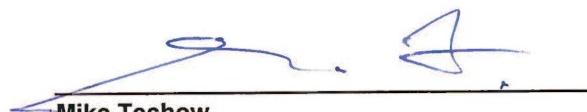
Received by Mike Techow on the 13th day of July, 2021 at 3:42 pm to be served on **Bayer Healthcare LLC, a Subsidiary of Bayer AG, for its Dr. Scholl's Line of Products by serving its Registered Agent, Corporation Service Company, 211 E. 7th St, Suite 620, Austin, Travis County, TX 78701**.

I, Mike Techow, being duly sworn, depose and say that on the 14th day of July, 2021 at 3:00 pm, I:

delivered to **REGISTERED AGENT** by delivering a true copy of the **Citation, Plaintiff's First Amended Complaint and Jury Demand** with the date of service endorsed thereon by me, to: **Samantha Guerra, Corporation Service Company as Authorized Agent at the address of: 211 E. 7th St, Suite 620, Austin, Travis County, TX 78701** on behalf of **Bayer Healthcare LLC, a Subsidiary of Bayer AG, for its Dr. Scholl's Line of Products**, and informed said person of the contents therein, in compliance with state statutes.

Description of Person Served: Age: 30, Sex: F, Race/Skin Color: Hispanic, Height: 5'6", Weight: 170, Hair: Black, Glasses: N

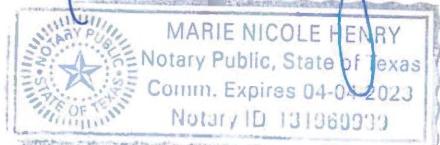
My name is Mike Techow. My date of birth is 6/26/1972. My work address is 809 Nueces, Austin, TX 78701. I declare under penalty of perjury that the foregoing is true and correct. Executed in Travis County on July 14th, 2021 by Mike Techow, declarant.



Mike Techow  
PSC-1215, Exp. 7/31/2022

On Time Couriers/Process  
1700 Pacific Avenue  
Ste 1040  
Dallas, TX 75201  
(214) 740-9999

Our Job Serial Number: ONT-2021003450  
Ref: Alvaro Alvarado



**FORM NO. 353-3 - CITATION  
THE STATE OF TEXAS**

**To:** BAYER HEALTHCARE LLC, A SUBSIDIARY OF BAYER AG, FOR ITS DR. SCHOLL'S LINE OF PRODUCTS  
SERVING AGENT CORPORATION SERVICE COMPANY D/B/A LAWYERS INCORPORATING SERVICE COMPANY  
211 E. 7TH STREET, SUITE 620  
AUSTIN, TX 78701-3218

**GREETINGS:**

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the 160th District Court at 600 Commerce Street, Ste. 101, Dallas, Texas 75202.

Said Plaintiff being **ALVARO ALVARADO AND MARIA LLANES**

Filed in said Court 16th day of June, 2021 against

AVENTIS INC., BAYER CONSUMER CARE HOLDINGS LLC F/K/A BAYER CONSUMER CARE LLC F/K/A MSD CONSUMER CARE, INC., BAYER HEALTHCARE LLC, A SUBSIDIARY OF BAYER AG, BRENNAG NORTH AMERICA, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO MINERAL PIGMENT SOLUTIONS, INC. AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), BRENNAG SPECIALTIES, LLC F/K/A BRENNAG SPECIALTIES, INC. F/K/A MINERAL PIGMENT SOLUTIONS, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), CLINIQUÉ LABORATORIES, INC., A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., CLINIQUÉ LABORATORIES, LLC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., COLOR TECHNIQUES, INC., COSMETIC SPECIALTIES, INC. (SUED INDIVIDUALLY AND FORMERLY D/B/A G&G SPECIALTY PRODUCTS CO.), CROWN LABORATORIES, INC, DR. SCHOLL'S LLC, ESTEE LAUDER, INC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES, INC, THE ESTEE LAUDER COMPANIES, INC. (SUED INDIVIDUALLY AND FOR LEN-RON MANUFACTURING CO. INC.), FIESTA MART, L.L.C., FISONS CORPORATION, GSK CONSUMER HEALTH, INC. F/K/A NOVARTIS CONSUMER HEALTH INC. F/K/A CIBA SELF-MEDICATION, INC. L'OREAL USA, INC., MAYBELLINE LLC, MERCK & CO., INC., NOVARTIS CORPORATION (SUED INDIVIDUALLY AND AS A SUCCESSOR-IN-INTEREST TO CIBAGEIGY CORPORATION AND ITS SUBSIDIARIES CIBA CONSUMER PHARMACEUTICALS AND CIBA SELF-MEDICATION, INC.), PFIZER INC., PRESPERSE CORPORATION, PRESPERSE INTERNATIONAL CORP, PTI UNION, LLC A/K/A PHARMA TECH INDUSTRIES, REVOLON CONSUMER PRODUCTS CORPORATION, SANOFI-AVENTIS U.S. LLC (SUED INDIVIDUALLY AND AS SUCCESSOR BY MERGER TO AVENTIS PHARMACEUTICALS INC.), SCHOLL'S WELLNESS COMPANY LLC, SPECIALTY MINERALS INC., (SUED INDIVIDUALLY AND AS A SUBSIDIARY OF MINERALS TECHNOLOGIES INC.), WHITTAKER CLARK & DANIELS, INC.

For Suit, said suit being numbered **DC-21-07664**, the nature of which demand is as follows: Suit on **OTHER (CIVIL)** etc. as shown on said petition, a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

**WITNESS:** FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office this 18th day of June, 2021.

**ATTEST:** FELICIA PITRE, Clerk of the District Courts of Dallas, County, Texas

By Kari Malone, Deputy  
**KARI MALONE**



**ESERVE**

**CITATION**

**DC-21-07664**

**ALVARO ALVARADO, et al**  
vs.  
**AVENTIS INC., et al**

**ISSUED THIS**  
**18th day of June, 2021**

**FELICIA PITRE**  
Clerk District Courts,  
Dallas County, Texas

**By: KARI MALONE, Deputy**

**Attorney for Plaintiff**  
**JENNIFER MONTEMAYOR**  
**1201 ELM STREET, SUITE 3400**  
**DALLAS, TEXAS 75270**  
**214-276-7680**  
**JMONTEMAYOR@SGPTRIA1.COM**

**DALLAS COUNTY**  
**SERVICE FEES**  
**NOT PAID**

**OFFICER'S RETURN**

Case No. : DC-21-07664

Court No.160th District Court

Style: ALVARO ALVARADO, et al

vs.

AVENTIS INC., et al

**AFFIDAVIT  
ATTACHED**

Came to hand on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_, at \_\_\_\_\_ o'clock \_\_\_\_\_.M. Executed at \_\_\_\_\_,  
within the County of \_\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_\_.M. on the \_\_\_\_\_ day of \_\_\_\_\_,  
20\_\_\_\_\_, by delivering to the within named \_\_\_\_\_

each in person, a true copy of this Citation together with the accompanying copy of this pleading, having first endorsed on same date of delivery. The distance actually traveled by me in serving such process was \_\_\_\_\_ miles and my fees are as follows: To certify which witness my hand.

For serving Citation \$ \_\_\_\_\_

For mileage \$ \_\_\_\_\_ of \_\_\_\_\_ County, \_\_\_\_\_

For Notary \$ \_\_\_\_\_ By \_\_\_\_\_ Deputy

(Must be verified if served outside the State of Texas.)

Signed and sworn to by the said \_\_\_\_\_ before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_,  
to certify which witness my hand and seal of office.

\_\_\_\_\_  
Notary Public \_\_\_\_\_ County \_\_\_\_\_

**State of Texas**

**County of Dallas**

**160th Judicial District Court**

Case Number: DC-21-07664

Plaintiff:

**Alvaro Alvarado and Maria Del Rosario Tobias**

vs.

Defendant:

**Aventis, Inc.; et al**

For:

Jennifer I. Montemayor  
1201 Elm Street  
Suite 3400  
Dallas, TX 75270

Received by Mike Techow on the 13th day of July, 2021 at 4:05 pm to be served on **Brentagg North America, Inc. c/o Texas Secretary of State, 1019 Brazos Street, Austin, Travis County, TX 78701**.

I, Mike Techow, being duly sworn, depose and say that on the **14th day of July, 2021** at **3:15 pm**, I:

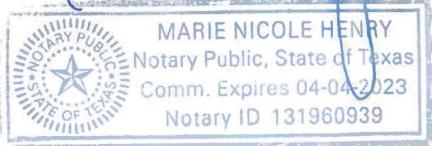
delivered to **REGISTERED AGENT** by delivering a true copy of the **Two Copies of Citation and Plaintiff's First Amended Complaint and Jury Demand with \$55.00 Texas Secretary of State Fee** with the date of service endorsed thereon by me, to: **Michelle Robinson, Texas Secretary of State as Authorized Agent** at the address of: **1019 Brazos Street, Austin, Travis County, TX 78701** on behalf of **Brentagg North America, Inc.**, and informed said person of the contents therein, in compliance with state statutes.

**Description of Person Served:** Age: 45, Sex: F, Race/Skin Color: White, Height: 5'11", Weight: 175, Hair: Blonde, Glasses: N

My name is Mike Techow. My date of birth is 6/26/1972. My work address is 809 Nueces, Austin, TX 78701. I declare under penalty of perjury that the foregoing is true and correct. Executed in Travis County on July 14th, 2021 by Mike Techow, declarant.

Subscribed and Sworn to before me on the 14th day of July, 2021 by the affiant who is personally known to me.

*Marie Henry*  
NOTARY PUBLIC



  
\_\_\_\_\_  
**Mike Techow**  
PSC-1215, Exp. 7/31/2022

**On Time Couriers/Process**  
1700 Pacific Avenue  
Ste 1040  
Dallas, TX 75201  
(214) 740-9999

Our Job Serial Number: ONT-2021003451  
Ref: Alvaro Alvarado

**FORM NO. 3534 CITATION  
THE STATE OF TEXAS**

**To:** BRENNETAG NORTH AMERICA, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO MINERAL PIGMENT SOLUTIONS, INC. AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.)  
BY SERVING THE SECRETARY OF STATE  
OFFICE OF THE SECRETARY OF STATE  
CITATIONS UNIT - P.O. BOX 12079  
AUSTIN, TX, 78711

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **160th District Court** at 600 Commerce Street, Dallas Texas, 75202.

Said **PLAINTIFF** being ALVARO ALVARADO AND MARIA LLANES

Filed in said Court on the **16th day of June, 2021** against

AVENTIS INC., BAYER CONSUMER CARE HOLDINGS LLC F/K/A BAYER CONSUMER CARE LLC F/K/A MSD CONSUMER CARE, INC., BAYER HEALTHCARE LLC, A SUBSIDIARY OF BAYER AG, BRENNETAG NORTH AMERICA, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO MINERAL PIGMENT SOLUTIONS, INC. AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), BRENNETAG SPECIALTIES, LLC F/K/A BRENNETAG SPECIALTIES, INC. F/K/A MINERAL PIGMENT SOLUTIONS, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), CLINIQUE LABORATORIES, INC., A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., CLINIQUE LABORATORIES, LLC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., COLOR TECHNIQUES, INC, COSMETIC SPECIALTIES, INC. (SUED INDIVIDUALLY AND FORMERLY D/B/A G&G SPECIALTY PRODUCTS CO.), CROWN LABORATORIES, INC, DR. SCHOLL'S LLC, ESTEE LAUDER, INC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES, INC, THE ESTEE LAUDER COMPANIES, INC. (SUED INDIVIDUALLY AND FOR LEN-RON MANUFACTURING CO. INC.), FIESTA MART, L.L.C., FISONS CORPORATION, GSK CONSUMER HEALTH, INC. F/K/A NOVARTIS CONSUMER HEALTH INC. F/K/A CIBA SELF-MEDICATION, INC. L'OREAL USA, INC., MAYBELLINE LLC, MERCK & CO., INC., NOVARTIS CORPORATION (SUED INDIVIDUALLY AND AS A SUCCESSOR-IN-INTEREST TO CIBA-GEIGY CORPORATION AND ITS SUBSIDIARIES CIBA CONSUMER PHARMACEUTICALS AND CIBA SELF-MEDICATION, INC.), PFIZER INC., PRESUPERSE CORPORATION, PRESUPERSE INTERNATIONAL CORP, PTI UNION, LLC A/K/A PHARMA TECH INDUSTRIES, REVOLON CONSUMER PRODUCTS CORPORATION, SANOFI-AVENTIS U.S. LLC (SUED INDIVIDUALLY AND AS SUCCESSOR BY MERGER TO AVENTIS PHARMACEUTICALS INC.), SCHOLL'S WELLNESS COMPANY LLC, SPECIALTY MINERALS INC., (SUED INDIVIDUALLY AND AS A SUBSIDIARY OF MINERALS TECHNOLOGIES INC.), WHITTAKER CLARK & DANIELS, INC.

For suit, said suit being numbered **DC-21-07664** the nature of which demand is as follows: **Suit On OTHER (CIVIL) etc.**

as shown on said petition a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

**WITNESS:** FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office on this the 18th day of June, 2021

ATTEST: FELICIA PITRE Clerk of the District Courts of Dallas, County, Texas

By Kari Malone, Deputy

KARI MALONE



**ESERVE (SOS)**

**CITATION**

No.: **DC-21-07664**

**ALVARO ALVARADO, et al**

vs.

**AVENTIS INC., et al**

**ISSUED**

**ON THIS THE 18TH DAY  
OF JUNE, 2021**

FELICIA PITRE

Clerk District Courts,  
Dallas County, Texas

By **KARI MALONE**, Deputy

Attorney for : Plaintiff  
**JENNIFER MONTEMAYOR**  
1201 Elm Street, Suite 3400  
Dallas, Texas 75270  
214-276-7680

**jmontemayor@sgptrial.com**

**DALLAS COUNTY  
SERVICE FEES  
NOT PAID**

Cause No. DC-21-07664  
Court No: 160th District Court

Style: ALVARO ALVARADO, et al  
vs.  
AVENTIS INC., et al

**OFFICER'S RETURN  
FOR INDIVIDUALS**

**AFFIDAVIT  
ATTACHED**

Received this Citation the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock. Executed at \_\_\_\_\_, within the County of \_\_\_\_\_, State of \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock, by delivering to the within named \_\_\_\_\_ each in person, a copy of this Citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

-----000000-----  
**OFFICER'S RETURN  
FOR CORPORATIONS**

Received this Citation the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_M. Executed at \_\_\_\_\_, within the County of \_\_\_\_\_, State of \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock \_\_\_\_M. by summoning the within named Corporation, \_\_\_\_\_

President - Vice President - Registered Agent - in person, of the said

a true copy of this citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

-----000000-----

The distance actually traveled by me in serving such process was \_\_\_\_\_ miles and my fees are as follows: To certify which witness by my hand.

For Serving Citation \$ \_\_\_\_\_

Sheriff \_\_\_\_\_

For Mileage \$ \_\_\_\_\_

County of \_\_\_\_\_

For Notary \$ \_\_\_\_\_

State of \_\_\_\_\_

Total Fees \$ \_\_\_\_\_

By \_\_\_\_\_

(Must be verified if served outside the State of Texas)

State of \_\_\_\_\_

County of \_\_\_\_\_

Signed and sworn to me by the said \_\_\_\_\_ before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, to certify which witness my hand and seal of office.

Seal

State & County of \_\_\_\_\_

**State of Texas**

**County of Dallas**

**160th Judicial District Court**

Case Number: DC-21-07664

Plaintiff:

**Alvaro Alvarado and Maria Del Rosario Tobias**

vs.

Defendant:

**Aventis, Inc.; et al**

For:

Jennifer I. Montemayor  
1201 Elm Street  
Suite 3400  
Dallas, TX 75270

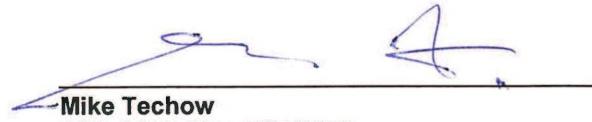
Received by Mike Techow on the 13th day of July, 2021 at 4:09 pm to be served on **Clinique Laboratories, Inc., a Subsidiary of The Estee Lauder Companies, Inc. c/o Texas Secretary of State, 1019 Brazos Street, Austin, Travis County, TX 78701**.

I, Mike Techow, being duly sworn, depose and say that on the **14th day of July, 2021 at 3:15 pm**, I:

delivered to **REGISTERED AGENT** by delivering a true copy of the **Two Copies of Citation and Plaintiff's First Amended Complaint and Jury Demand with \$55.00 Texas Secretary of State Fee** with the date of service endorsed thereon by me, to: **Michelle Robinson, Texas Secretary of State as Authorized Agent at the address of: 1019 Brazos Street, Austin, Travis County, TX 78701** on behalf of **Clinique Laboratories, Inc., a Subsidiary of The Estee Lauder Companies, Inc.**, and informed said person of the contents therein, in compliance with state statutes.

**Description of Person Served:** Age: 45, Sex: F, Race/Skin Color: White, Height: 5'11", Weight: 175, Hair: Blonde, Glasses: N

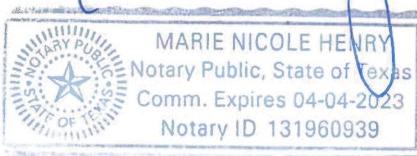
My name is Mike Techow. My date of birth is 6/26/1972. My work address is 809 Nueces, Austin, TX 78701. I declare under penalty of perjury that the foregoing is true and correct. Executed in Travis County on July 14th, 2021 by Mike Techow, declarant.



Mike Techow  
PSC-1215, Exp. 7/31/2022

On Time Couriers/Process  
1700 Pacific Avenue  
Ste 1040  
Dallas, TX 75201  
(214) 740-9999

Our Job Serial Number: ONT-2021003452  
Ref: Alvaro Alvarado



**FORM NO. 3534 CITATION  
THE STATE OF TEXAS**

**To: CLINIQUE LABORATORIES, INC., A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC.  
BY SERVING THE SECRETARY OF STATE  
OFFICE OF THE SECRETARY OF STATE  
CITATIONS UNIT - P.O. BOX 12079  
AUSTIN, TX, 78711**

**GREETINGS:**

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **160th District Court** at 600 Commerce Street, Dallas Texas, 75202.

Said **PLAINTIFF** being **ALVARO ALVARADO AND MARIA LLANES**

Filed in said Court on the **16th day of June, 2021** against

**AVENTIS INC., BAYER CONSUMER CARE HOLDINGS LLC F/K/A BAYER CONSUMER CARE LLC F/K/A MSD CONSUMER CARE, INC., BAYER  
HEALTHCARE LLC, A SUBSIDIARY OF BAYER AG, BRENNETAG NORTH AMERICA, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-  
INTEREST TO MINERAL PIGMENT SOLUTIONS, INC. AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.),  
BRENNETAG SPECIALTIES, LLC F/K/A BRENNETAG SPECIALTIES, INC. F/K/A MINERAL PIGMENT SOLUTIONS, INC. (SUED INDIVIDUALLY  
AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), CLINIQUE LABORATORIES, INC., A SUBSIDIARY OF THE  
ESTEE LAUDER COMPANIES INC., CLINIQUE LABORATORIES, LLC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., COLOR  
TECHNIQUES, INC, COSMETIC SPECIALTIES, INC. (SUED INDIVIDUALLY AND FORMERLY D/B/A G&G SPECIALTY PRODUCTS CO.),  
CROWN LABORATORIES, INC, DR. SCHOLL'S LLC, ESTEE LAUDER, INC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES, INC, THE  
ESTEE LAUDER COMPANIES, INC. (SUED INDIVIDUALLY AND FOR LEN-RON MANUFACTURING CO. INC.), FIESTA MART, L.L.C., FISONS  
CORPORATION, GSK CONSUMER HEALTH, INC. F/K/A NOVARTIS CONSUMER HEALTH INC. F/K/A CIBA SELF-MEDICATION, INC.  
L'OREAL USA, INC., MAYBELLINE LLC, MERCK & CO., INC., NOVARTIS CORPORATION (SUED INDIVIDUALLY AND AS A SUCCESSOR-IN-  
INTEREST TO CIBA-GEIGY CORPORATION AND ITS SUBSIDIARIES CIBA CONSUMER PHARMACEUTICALS AND CIBA SELF-MEDICATION,  
INC.), PFIZER INC., PRESERPSE CORPORATION, PRESERPSE INTERNATIONAL CORP, PTI UNION, LLC A/K/A PHARMA TECH INDUSTRIES,  
REVOL CONSUMER PRODUCTS CORPORATION, SANOFI-AVENTIS U.S. LLC (SUED INDIVIDUALLY AND AS SUCCESSOR BY MERGER TO  
AVENTIS PHARMACEUTICALS INC.), SCHOLL'S WELLNESS COMPANY LLC, SPECIALTY MINERALS INC., (SUED INDIVIDUALLY AND AS A  
SUBSIDIARY OF MINERALS TECHNOLOGIES INC.), WHITTAKER CLARK & DANIELS, INC.**

For suit, said suit being numbered **DC-21-07664** the nature of which demand is as follows: **Suit On OTHER (CIVIL) etc.**

as shown on said petition a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

**WITNESS:** FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office **on this the 18th day of June, 2021**

ATTEST: FELICIA PITRE Clerk of the District Courts of Dallas, County, Texas

By

  
**KARI MALONE**

, Deputy



**ESERVE (SOS)**

**CITATION**

**No.: DC-21-07664**

**ALVARO ALVARADO, et al**

**vs.**

**AVENTIS INC., et al**

**ISSUED**

**ON THIS THE 18TH DAY  
OF JUNE, 2021**

**FELICIA PITRE**

Clerk District Courts,  
Dallas County, Texas

By **KARI MALONE**, Deputy

Attorney for : Plaintiff  
**JENNIFER MONTEMAYOR**

1201 Elm Street, Suite 3400

Dallas, Texas 75270

214-276-7680

**jmontemayor@sgptrial.com**

**DALLAS COUNTY  
SERVICE FEES  
NOT PAID**

Cause No. DC-21-07664  
Court No: 160th District Court

Style: ALVARO ALVARADO, et al  
vs.  
AVENTIS INC., et al

**OFFICER'S RETURN  
FOR INDIVIDUALS**

**AFFIDAVIT  
ATTACHED**

Received this Citation the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock. Executed at \_\_\_\_\_, within the County of \_\_\_\_\_, State of \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock, by delivering to the within named \_\_\_\_\_ each in person, a copy of this Citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

-----000000-----  
**OFFICER'S RETURN  
FOR CORPORATIONS**

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President - Vice President - Registered Agent - in person, of the said

a true copy of this citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

-----000000-----

The distance actually traveled by me in serving such process was \_\_\_\_\_ miles and my fees are as follows: To certify which witness by my hand.

For Serving Citation \$ \_\_\_\_\_

Sheriff \_\_\_\_\_

For Mileage \$ \_\_\_\_\_

County of \_\_\_\_\_

For Notary \$ \_\_\_\_\_

State of \_\_\_\_\_

Total Fees \$ \_\_\_\_\_

By \_\_\_\_\_

(Must be verified if served outside the State of Texas)

State of \_\_\_\_\_

County of \_\_\_\_\_

Signed and sworn to me by the said \_\_\_\_\_ before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, to certify which witness my hand and seal of office.

Seal

State & County of \_\_\_\_\_

Case 3:21-cv-01850-S Document 1-2 Filed 08/09/21 Page 169 of 183 PageID 183  
**AFFIDAVIT OF SERVICE**

State of Texas

County of Dallas

160th Judicial District Court

Case Number: DC-21-07664

Plaintiff:

**Alvaro Alvarado and Maria Del Rosario Tobias**

vs.

Defendant:

**Aventis, Inc.; et al**

For:

Jennifer I. Montemayor  
1201 Elm Street  
Suite 3400  
Dallas, TX 75270

Received by Mike Techow on the 13th day of July, 2021 at 4:11 pm to be served on **Clinique Laboratories, LLC., a Subsidiary of The Estee Lauder Companies, Inc. c/o Texas Secretary of State, 1019 Brazos Street, Austin, Travis County, TX 78701**.

I, Mike Techow, being duly sworn, depose and say that on the **14th day of July, 2021 at 3:15 pm**, I:

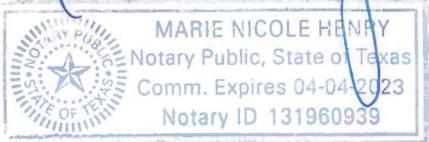
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**Description of Person Served:** Age: 45, Sex: F, Race/Skin Color: White, Height: 5'11", Weight: 175, Hair: Blonde, Glasses: N

My name is Mike Techow. My date of birth is 6/26/1972. My work address is 809 Nueces, Austin, TX 78701. I declare under penalty of perjury that the foregoing is true and correct. Executed in Travis County on July 14th, 2021 by Mike Techow, declarant.

Subscribed and Sworn to before me on the 14th day of July, 2021 by the affiant who is personally known to me.

*Marie Nicole Henry*  
NOTARY PUBLIC



*Mike Techow*  
Mike Techow  
PSC-1215, Exp. 7/31/2022

On Time Couriers/Process  
1700 Pacific Avenue  
Ste 1040  
Dallas, TX 75201  
(214) 740-9999

Our Job Serial Number: ONT-2021003453  
Ref: Alvaro Alvarado

**FORM NO. 3534 CITATION**

**THE STATE OF TEXAS**

**To:** CLINIQUE LABORATORIES, LLC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC.  
BY SERVING THE SECRETARY OF STATE  
OFFICE OF THE SECRETARY OF STATE  
CITATIONS UNIT - P.O. BOX 12079  
AUSTIN, TX, 78711

**GREETINGS:**

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For suit, said suit being numbered **DC-21-07664** the nature of which demand is as follows: **Suit On OTHER (CIVIL) etc.**

as shown on said petition a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

**WITNESS:** FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office on **this the 18th day of June, 2021**

ATTEST: FELICIA PITRE Clerk of the District Courts of Dallas, County, Texas

By Kari Malone, Deputy

KARI MALONE



**ESERVE (SOS)**

**CITATION**

No.: **DC-21-07664**

**ALVARO ALVARADO, et al**

vs.

**AVENTIS INC., et al**

**ISSUED  
ON THIS THE 18TH DAY  
OF JUNE, 2021**

FELICIA PITRE  
Clerk District Courts,  
Dallas County, Texas

By **KARI MALONE**, Deputy

---

Attorney for : Plaintiff  
**JENNIFER MONTEMAYOR**  
1201 Elm Street, Suite 3400  
Dallas, Texas 75270  
214-276-7680  
[jmontemayor@sgptrial1.com](mailto:jmontemayor@sgptrial1.com)

**DALLAS COUNTY  
SERVICE FEES  
NOT PAID**

Cause No. DC-21-07664  
Court No: 160th District Court

Style: ALVARO ALVARADO, et al  
vs.  
AVENTIS INC., et al

**OFFICER'S RETURN  
FOR INDIVIDUALS**

**AFFIDAVIT  
ATTACHED**

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**OFFICER'S RETURN  
FOR CORPORATIONS**

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President - Vice President - Registered Agent - in person, of the said

a true copy of this citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

-----000000-----

The distance actually traveled by me in serving such process was \_\_\_\_\_ miles and my fees are as follows: To certify which witness by my hand.

For Serving Citation \$ \_\_\_\_\_ Sheriff \_\_\_\_\_  
For Mileage \$ \_\_\_\_\_ County of \_\_\_\_\_  
For Notary \$ \_\_\_\_\_ State of \_\_\_\_\_  
Total Fees \$ \_\_\_\_\_ By \_\_\_\_\_

(Must be verified if served outside the State of Texas)

State of \_\_\_\_\_  
County of \_\_\_\_\_

Signed and sworn to me by the said \_\_\_\_\_ before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, to certify which witness my hand and seal of office.

Seal

State & County of \_\_\_\_\_

Case 3:21-cv-01850-S Document 1-2 Filed 08/09/21 Page 172 of 183 PageID 186

**AFFIDAVIT OF SERVICE**

**State of Texas**

**County of Dallas**

**160th Judicial District Court**

Case Number: DC-21-07664

Plaintiff:

**Alvaro Alvarado and Maria Del Rosario Tobias**

vs.

Defendant:

**Aventis, Inc.; et al**

For:

Jennifer I. Montemayor  
1201 Elm Street  
Suite 3400  
Dallas, TX 75270

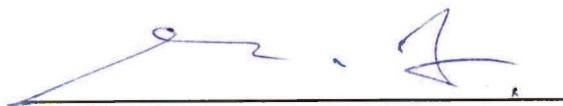
Received by Mike Techow on the 13th day of July, 2021 at 4:15 pm to be served on **Color Techniques, Inc. c/o Texas Secretary of State, 1019 Brazos Street, Austin, Travis County, TX 78701**.

I, Mike Techow, being duly sworn, depose and say that on the **14th day of July, 2021** at **3:15 pm**, I:

delivered to **REGISTERED AGENT** by delivering a true copy of the **Two Copies of Citation and Plaintiff's First Amended Complaint and Jury Demand with \$55.00 Texas Secretary of State Fee** with the date of service endorsed thereon by me, to: **Michelle Robinson, Texas Secretary of State as Authorized Agent** at the address of: **1019 Brazos Street, Austin, Travis County, TX 78701** on behalf of **Color Techniques, Inc.**, and informed said person of the contents therein, in compliance with state statutes.

**Description of Person Served:** Age: 45, Sex: F, Race/Skin Color: White, Height: 5'11", Weight: 175, Hair: Blonde, Glasses: N

My name is Mike Techow. My date of birth is 6/26/1972. My work address is 809 Nueces, Austin, TX 78701. I declare under penalty of perjury that the foregoing is true and correct. Executed in Travis County on July 14th, 2021 by Mike Techow, declarant.



**Mike Techow**  
PSC-1215, Exp. 7/31/2022

**On Time Couriers/Process**  
1700 Pacific Avenue  
Ste 1040  
Dallas, TX 75201  
(214) 740-9999

Our Job Serial Number: ONT-2021003455  
Ref: Alvaro Alvarado

Subscribed and Sworn to before me on the 14th day of July, 2021 by the affiant who is personally known to me.



**FORM NO. 3534 CITATION  
THE STATE OF TEXAS**

**To:** COLOR TECHNIQUES, INC.  
BY SERVING THE SECRETARY OF STATE  
OFFICE OF THE SECRETARY OF STATE  
CITATIONS UNIT - P.O. BOX 12079  
AUSTIN, TX, 78711

**GREETINGS:**

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **160th District Court** at 600 Commerce Street, Dallas Texas, 75202.

Said PLAINTIFF being ALVARO ALVARADO AND MARIA LLANES

Filed in said Court on the **16th day of June, 2021** against

AVENTIS INC., BAYER CONSUMER CARE HOLDINGS LLC F/K/A BAYER CONSUMER CARE LLC F/K/A MSD CONSUMER CARE, INC., BAYER HEALTHCARE LLC, A SUBSIDIARY OF BAYER AG, BRENNAG NORTH AMERICA, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO MINERAL PIGMENT SOLUTIONS, INC. AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), BRENNAG SPECIALTIES, LLC F/K/A BRENNAG SPECIALTIES, INC. F/K/A MINERAL PIGMENT SOLUTIONS, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), CLINIQUE LABORATORIES, INC., A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., CLINIQUE LABORATORIES, LLC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., COLOR TECHNIQUES, INC., COSMETIC SPECIALTIES, INC. (SUED INDIVIDUALLY AND FORMERLY D/B/A G&G SPECIALTY PRODUCTS CO.), CROWN LABORATORIES, INC., DR. SCHOLL'S LLC, ESTEE LAUDER, INC., A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES, INC., THE ESTEE LAUDER COMPANIES, INC. (SUED INDIVIDUALLY AND FOR LEN-RON MANUFACTURING CO. INC.), FIESTA MART, L.L.C., FISONS CORPORATION, GSK CONSUMER HEALTH, INC. F/K/A NOVARTIS CONSUMER HEALTH INC. F/K/A CIBA SELF-MEDICATION, INC. L'OREAL USA, INC., MAYBELLINE LLC, MERCK & CO., INC., NOVARTIS CORPORATION (SUED INDIVIDUALLY AND AS A SUCCESSOR-IN-INTEREST TO CIBA-GEIGY CORPORATION AND ITS SUBSIDIARIES CIBA CONSUMER PHARMACEUTICALS AND CIBA SELF-MEDICATION, INC.), PFIZER INC., PRESERSE CORPORATION, PRESERSE INTERNATIONAL CORP, PTI UNION, LLC A/K/A PHARMA TECH INDUSTRIES, REVOLON CONSUMER PRODUCTS CORPORATION, SANOFI-AVENTIS U.S. LLC (SUED INDIVIDUALLY AND AS SUCCESSOR BY MERGER TO AVENTIS PHARMACEUTICALS INC.), SCHOLL'S WELLNESS COMPANY LLC, SPECIALTY MINERALS INC., (SUED INDIVIDUALLY AND AS A SUBSIDIARY OF MINERALS TECHNOLOGIES INC.), WHITTAKER CLARK & DANIELS, INC.

For suit, said suit being numbered **DC-21-07664** the nature of which demand is as follows: **Suit On OTHER (CIVIL) etc.**

as shown on said petition a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

**WITNESS:** FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office on this the **18th day of June, 2021**

ATTEST: FELICIA PITRE Clerk of the District Courts of Dallas, County, Texas

By Kari Malone, Deputy

KARI MALONE



**ESERVE (SOS)**

**CITATION**

No.: **DC-21-07664**

**ALVARO ALVARADO, et al**

vs.

**AVENTIS INC., et al**

**ISSUED**

**ON THIS THE 18TH DAY  
OF JUNE, 2021**

**FELICIA PITRE**

Clerk District Courts,  
Dallas County, Texas

By **KARI MALONE**, Deputy

Attorney for : Plaintiff  
**JENNIFER MONTEMAYOR**

1201 Elm Street, Suite 3400

Dallas, Texas 75270

214-276-7680

jmontemayor@sgptrial.com

**DALLAS COUNTY  
SERVICE FEES  
NOT PAID**

Cause No. DC-21-07664  
Court No: 160th District Court

Style: ALVARO ALVARADO, et al  
vs.  
AVENTIS INC., et al

**OFFICER'S RETURN  
FOR INDIVIDUALS**

**AFFIDAVIT  
ATTACHED**

Received this Citation the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock. Executed at \_\_\_\_\_, within the County of \_\_\_\_\_, State of \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock, by \_\_\_\_\_ delivering to the within named \_\_\_\_\_ each in person, a copy of this Citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

-----000000-----  
**OFFICER'S RETURN  
FOR CORPORATIONS**

Received this Citation the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_ M. Executed at \_\_\_\_\_, within the County of \_\_\_\_\_, State of \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock \_\_\_\_ M. by summoning the within named Corporation,

President - Vice President - Registered Agent - in person, of the said

a true copy of this citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

-----000000-----

The distance actually traveled by me in serving such process was \_\_\_\_\_ miles and my fees are as follows: To certify which witness by my hand.

For Serving Citation \$ \_\_\_\_\_

Sheriff \_\_\_\_\_

For Mileage \$ \_\_\_\_\_

County of \_\_\_\_\_

For Notary \$ \_\_\_\_\_

State of \_\_\_\_\_

Total Fees \$ \_\_\_\_\_

By \_\_\_\_\_

(Must be verified if served outside the State of Texas)

State of \_\_\_\_\_

County of \_\_\_\_\_

Signed and sworn to me by the said \_\_\_\_\_ before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, to certify which witness my hand and seal of office.

Seal

State & County of \_\_\_\_\_

Case 3:21-cv-01850-S Document 1-2 Filed 08/09/21 Page 175 of 183 PageID 189

**AFFIDAVIT OF SERVICE**

**State of Texas**

**County of Dallas**

**160th Judicial District Court**

Case Number: DC-21-07664

Plaintiff:

**Alvaro Alvarado and Maria Del Rosario Tobias**

vs.

Defendant:

**Aventis, Inc.; et al**

For:

Jennifer I. Montemayor  
1201 Elm Street  
Suite 3400  
Dallas, TX 75270

Received by Mike Techow on the 13th day of July, 2021 at 4:24 pm to be served on **Crown Laboratories, Inc. c/o Texas Secretary of State, 1019 Brazos Street, Austin, Travis County, TX 78701**.

I, Mike Techow, being duly sworn, depose and say that on the **14th day of July, 2021** at **3:15 pm**, I:

delivered to **REGISTERED AGENT** by delivering a true copy of the **Two Copies of Citation and Plaintiff's First Amended Complaint and Jury Demand with \$55.00 Texas Secretary of State Fee** with the date of service endorsed thereon by me, to: **Michelle Robinson, Texas Secretary of State as Authorized Agent** at the address of: **1019 Brazos Street, Austin, Travis County, TX 78701** on behalf of **Crown Laboratories, Inc.**, and informed said person of the contents therein, in compliance with state statutes.

**Description of Person Served:** Age: 45, Sex: F, Race/Skin Color: White, Height: 5'11", Weight: 175, Hair: Blonde, Glasses: N

My name is Mike Techow. My date of birth is 6/26/1972. My work address is 809 Nueces, Austin, TX 78701. I declare under penalty of perjury that the foregoing is true and correct. Executed in Travis County on July 14th, 2021 by Mike Techow, declarant.

Subscribed and Sworn to before me on the 14th day of July, 2021 by the affiant who is personally known to me.

*Marie Nicole Henry*  
NOTARY PUBLIC  
  
MARIE NICOLE HENRY  
Notary Public, State of Texas  
Comm. Expires 04-04-2023  
Notary ID T51060000

  
**Mike Techow**  
PSC-1215, Exp. 7/31/2022

**On Time Couriers/Process**  
1700 Pacific Avenue  
Ste 1040  
Dallas, TX 75201  
(214) 740-9999

Our Job Serial Number: ONT-2021003456  
Ref: Alvaro Alvarado

**FORM NO. 3534 CITATION**

**THE STATE OF TEXAS**

**To:** CROWN LABORATORIES, INC.  
BY SERVING THE SECRETARY OF STATE  
OFFICE OF THE SECRETARY OF STATE  
CITATIONS UNIT - P.O. BOX 12079  
AUSTIN, TX, 78711

**GREETINGS:**

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **160th District Court** at 600 Commerce Street, Dallas Texas, 75202.

Said **PLAINTIFF** being ALVARO ALVARADO AND MARIA LLANES

Filed in said Court on the **16th day of June, 2021** against

AVENTIS INC., BAYER CONSUMER CARE HOLDINGS LLC F/K/A BAYER CONSUMER CARE LLC F/K/A MSD CONSUMER CARE, INC., BAYER HEALTHCARE LLC, A SUBSIDIARY OF BAYER AG, BRENNAG NORTH AMERICA, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO MINERAL PIGMENT SOLUTIONS, INC. AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), BRENNAG SPECIALTIES, LLC F/K/A BRENNAG SPECIALTIES, INC. F/K/A MINERAL PIGMENT SOLUTIONS, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), CLINIQUE LABORATORIES, INC., A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., CLINIQUE LABORATORIES, LLC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., COLOR TECHNIQUES, INC, COSMETIC SPECIALTIES, INC. (SUED INDIVIDUALLY AND FORMERLY D/B/A G&G SPECIALTY PRODUCTS CO.), CROWN LABORATORIES, INC, DR. SCHOLL'S LLC, ESTEE LAUDER, INC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES, INC, THE ESTEE LAUDER COMPANIES, INC. (SUED INDIVIDUALLY AND FOR LEN-RON MANUFACTURING CO. INC.), FIESTA MART, L.L.C., FISONS CORPORATION, GSK CONSUMER HEALTH, INC. F/K/A NOVARTIS CONSUMER HEALTH INC. F/K/A CIBA SELF-MEDICATION, INC. L'OREAL USA, INC., MAYBELLINE LLC, MERCK & CO., INC., NOVARTIS CORPORATION (SUED INDIVIDUALLY AND AS A SUCCESSOR-IN-INTEREST TO CIBA-GEIGY CORPORATION AND ITS SUBSIDIARIES CIBA CONSUMER PHARMACEUTICALS AND CIBA SELF-MEDICATION, INC.), PFIZER INC., PRESPERSE CORPORATION, PRESPERSE INTERNATIONAL CORP, PTI UNION, LLC A/K/A PHARMA TECH INDUSTRIES, REVOL CONSUMER PRODUCTS CORPORATION, SANOFI-AVENTIS U.S. LLC (SUED INDIVIDUALLY AND AS SUCCESSOR BY MERGER TO AVENTIS PHARMACEUTICALS INC.), SCHOLL'S WELLNESS COMPANY LLC, SPECIALTY MINERALS INC., (SUED INDIVIDUALLY AND AS A SUBSIDIARY OF MINERALS TECHNOLOGIES INC.), WHITTAKER CLARK & DANIELS, INC.

For suit, said suit being numbered **DC-21-07664** the nature of which demand is as follows: **Suit On OTHER (CIVIL) etc.**

as shown on said petition a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

**WITNESS:** FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office **on this the 18th day of June, 2021**

ATTEST: FELICIA PITRE Clerk of the District Courts of Dallas, County, Texas

By \_\_\_\_\_

  
KARI MALONE

, Deputy



**ESERVE (SOS)**

**CITATION**

No.: **DC-21-07664**

**ALVARO ALVARADO, et al**

**vs.**

**AVENTIS INC., et al**

**ISSUED**

**ON THIS THE 18TH DAY  
OF JUNE, 2021**

**FELICIA PITRE**

Clerk District Courts,  
Dallas County, Texas

By **KARI MALONE**, Deputy

Attorney for : Plaintiff  
**JENNIFER MONTEMAYOR**

1201 Elm Street, Suite 3400

Dallas, Texas 75270

214-276-7680

[jmontemayor@sgptrial.com](mailto:jmontemayor@sgptrial.com)

**DALLAS COUNTY  
SERVICE FEES  
NOT PAID**

Cause No. DC-21-07664  
Court No: 160th District Court

Style: ALVARO ALVARADO, et al  
vs.  
AVENTIS INC., et al

**OFFICER'S RETURN  
FOR INDIVIDUALS**

**AFFIDAVIT  
ATTACHED**

Received this Citation the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock. Executed at \_\_\_\_\_, within the County of \_\_\_\_\_, State of \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock, by delivering to the within named \_\_\_\_\_ each in person, a copy of this Citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

-----000000-----  
**OFFICER'S RETURN  
FOR CORPORATIONS**

Received this Citation the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_M. Executed at \_\_\_\_\_, within the County of \_\_\_\_\_, State of \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock \_\_\_\_M. by summoning the within named Corporation, \_\_\_\_\_

President - Vice President - Registered Agent - in person, of the said

a true copy of this citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

-----000000-----

The distance actually traveled by me in serving such process was \_\_\_\_\_ miles and my fees are as follows: To certify which witness by my hand.

For Serving Citation \$ \_\_\_\_\_

Sheriff \_\_\_\_\_

For Mileage \$ \_\_\_\_\_

County of \_\_\_\_\_

For Notary \$ \_\_\_\_\_

State of \_\_\_\_\_

Total Fees \$ \_\_\_\_\_

By \_\_\_\_\_

(Must be verified if served outside the State of Texas)

State of \_\_\_\_\_

County of \_\_\_\_\_

Signed and sworn to me by the said \_\_\_\_\_ before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, to certify which witness my hand and seal of office.

Seal

State & County of \_\_\_\_\_

Case 3:21-cv-01850-S Document 1-2 Filed 08/09/21 Page 178 of 183 PageID 192  
**AFFIDAVIT OF SERVICE**

**State of Texas**

**County of Dallas**

**160th Judicial District Court**

Case Number: DC-21-07664

Plaintiff:

**Alvaro Alvarado and Maria Del Rosario Tobias**

vs.

Defendant:

**Aventis, Inc.; et al**

For:

Jennifer I. Montemayor  
1201 Elm Street  
Suite 3400  
Dallas, TX 75270

Received by Mike Techow on the 13th day of July, 2021 at 4:23 pm to be served on **Cosmetic Specialties, Inc. c/o Texas Secretary of State, 1019 Brazos Street, Austin, TX 78701**.

I, Mike Techow, being duly sworn, depose and say that on the **14th day of July, 2021 at 3:15 pm**, I:

delivered to **REGISTERED AGENT** by delivering a true copy of the **Two Copies of Citation and Plaintiff's First Amended Complaint and Jury Demand with \$55.00 Texas Secretary of State Fee** with the date of service endorsed thereon by me, to: **Michelle Robinson, Texas Secretary of State as Authorized Agent** at the address of: **1019 Brazos Street, Austin, Travis County, TX 78701** on behalf of **Cosmetic Specialties, Inc.**, and informed said person of the contents therein, in compliance with state statutes.

**Description of Person Served:** Age: 45, Sex: F, Race/Skin Color: White, Height: 5'11", Weight: 175, Hair: Blonde, Glasses: N

My name is Mike Techow. My date of birth is 6/26/1972. My work address is 809 Nueces, Austin, TX 78701. I declare under penalty of perjury that the foregoing is true and correct. Executed in Travis County on July 14th, 2021 by Mike Techow, declarant.



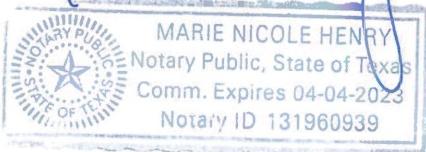
**Mike Techow**  
PSC-1215, Exp. 7/31/2022

**On Time Couriers/Process**  
1700 Pacific Avenue  
Ste 1040  
Dallas, TX 75201  
(214) 740-9999

Our Job Serial Number: ONT-2021003457  
Ref: Alvaro Alvarado

Subscribed and Sworn to before me on the 14th day of July, 2021 by the affiant who is personally known to me.

*Marie Henry*  
NOTARY PUBLIC



**FORM NO. 3534 CITATION**

**THE STATE OF TEXAS**

**To:** COSMETIC SPECIALTIES, INC. (SUED INDIVIDUALLY AND FORMERLY D/B/A G&G SPECIALTY PRODUCTS CO.)  
BY SERVING THE SECRETARY OF STATE  
OFFICE OF THE SECRETARY OF STATE  
CITATIONS UNIT - P.O. BOX 12079  
AUSTIN, TX, 78711

**GREETINGS:**

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **160th District Court** at 600 Commerce Street, Dallas Texas, 75202.

Said **PLAINTIFF** being ALVARO ALVARADO AND MARIA LLANES

Filed in said Court on the **16th day of June, 2021** against

AVENTIS INC., BAYER CONSUMER CARE HOLDINGS LLC F/K/A BAYER CONSUMER CARE LLC F/K/A MSD CONSUMER CARE, INC., BAYER HEALTHCARE LLC, A SUBSIDIARY OF BAYER AG, BRENNTAG NORTH AMERICA, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO MINERAL PIGMENT SOLUTIONS, INC. AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), BRENNTAG SPECIALTIES, LLC F/K/A BRENNTAG SPECIALTIES, INC. F/K/A MINERAL PIGMENT SOLUTIONS, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), CLINIQUE LABORATORIES, INC., A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., CLINIQUE LABORATORIES, LLC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., COLOR TECHNIQUES, INC, COSMETIC SPECIALTIES, INC. (SUED INDIVIDUALLY AND FORMERLY D/B/A G&G SPECIALTY PRODUCTS CO.), CROWN LABORATORIES, INC, DR. SCHOLL'S LLC, ESTEE LAUDER, INC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES, INC, THE ESTEE LAUDER COMPANIES, INC. (SUED INDIVIDUALLY AND FOR LEN-RON MANUFACTURING CO. INC.), FIESTA MART, L.L.C., FISONS CORPORATION, GSK CONSUMER HEALTH, INC. F/K/A NOVARTIS CONSUMER HEALTH INC. F/K/A CIBA SELF-MEDICATION, INC. L'OREAL USA, INC., MAYBELLINE LLC, MERCK & CO., INC., NOVARTIS CORPORATION (SUED INDIVIDUALLY AND AS A SUCCESSOR-IN-INTEREST TO CIBA-GEIGY CORPORATION AND ITS SUBSIDIARIES CIBA CONSUMER PHARMACEUTICALS AND CIBA SELF-MEDICATION, INC.), PFIZER INC., PRESPERSE CORPORATION, PRESPERSE INTERNATIONAL CORP, PTI UNION, LLC A/K/A PHARMA TECH INDUSTRIES, REVOLIN CONSUMER PRODUCTS CORPORATION, SANOFI-AVENTIS U.S. LLC (SUED INDIVIDUALLY AND AS SUCCESSOR BY MERGER TO AVENTIS PHARMACEUTICALS INC.), SCHOLL'S WELLNESS COMPANY LLC, SPECIALTY MINERALS INC., (SUED INDIVIDUALLY AND AS A SUBSIDIARY OF MINERALS TECHNOLOGIES INC.), WHITTAKER CLARK & DANIELS, INC.

For suit, said suit being numbered **DC-21-07664** the nature of which demand is as follows: **Suit On OTHER (CIVIL) etc.**

as shown on said petition a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

**WITNESS:** FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office **on this the 18th day of June, 2021**

ATTEST: FELICIA PITRE Clerk of the District Courts of Dallas, County, Texas

By

  
KARI MALONE

, Deputy



**ESERVE (SOS)**

**CITATION**

No.: **DC-21-07664**

**ALVARO ALVARADO, et al**

**vs.**

**AVENTIS INC., et al**

**ISSUED  
ON THIS THE 18TH DAY  
OF JUNE, 2021**

FELICIA PITRE  
Clerk District Courts,  
Dallas County, Texas

By **KARI MALONE**, Deputy

Attorney for : Plaintiff  
**JENNIFER MONTEMAYOR**  
1201 Elm Street, Suite 3400  
Dallas, Texas 75270  
214-276-7680  
[jmontemayor@sgptrial1.com](mailto:jmontemayor@sgptrial1.com)

**DALLAS COUNTY  
SERVICE FEES  
NOT PAID**

**OFFICER'S RETURN  
FOR INDIVIDUALS**

Cause No. DC-21-07664

Court No: 160th District Court

Style: ALVARO ALVARADO, et al

vs.

AVENTIS INC., et al

**AFFIDAVIT  
ATTACHED**

Received this Citation the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock. Executed at \_\_\_\_\_, within the County of \_\_\_\_\_, State of \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock, by \_\_\_\_\_ delivering to the within named \_\_\_\_\_ each in person, a copy of this Citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

-----000000-----  
**OFFICER'S RETURN  
FOR CORPORATIONS**

Received this Citation the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_M. Executed at \_\_\_\_\_, within the County of \_\_\_\_\_, State of \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock \_\_\_\_M. by summoning the within named Corporation, \_\_\_\_\_

President - Vice President - Registered Agent - in person, of the said

a true copy of this citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

-----000000-----

The distance actually traveled by me in serving such process was \_\_\_\_\_ miles and my fees are as follows: To certify which witness by my hand.

For Serving Citation \$ \_\_\_\_\_ Sheriff \_\_\_\_\_  
For Mileage \$ \_\_\_\_\_ County of \_\_\_\_\_  
For Notary \$ \_\_\_\_\_ State of \_\_\_\_\_  
Total Fees \$ \_\_\_\_\_ By \_\_\_\_\_

(Must be verified if served outside the State of Texas)

State of \_\_\_\_\_

County of \_\_\_\_\_

Signed and sworn to me by the said \_\_\_\_\_ before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, to certify which witness my hand and seal of office.

Seal

State & County of \_\_\_\_\_

AFFIDAVIT OF SERVICE

State of Texas

County of Dallas

160th Judicial District Court

Case Number: DC-21-07664

Plaintiff:

Alvaro Alvarado and Maria Del Rosario Tobias

vs.

Defendant:

Aventis, Inc.; et al

For:

Jennifer I. Montemayor  
1201 Elm Street  
Suite 3400  
Dallas, TX 75270

Received by Mike Techow on the 13th day of July, 2021 at 4:27 pm to be served on Dr. Scholl's LLC c/o Texas Secretary of State, 1019 Brazos Street, Austin, Travis County, TX 78701.

I, Mike Techow, being duly sworn, depose and say that on the 14th day of July, 2021 at 3:15 pm, I:

delivered to REGISTERED AGENT by delivering a true copy of the Two Copies of Citation and Plaintiff's First Amended Complaint and Jury Demand with \$55.00 Texas Secretary of State Fee with the date of service endorsed thereon by me, to: Michelle Robinson, Texas Secretary of State as Authorized Agent at the address of: 1019 Brazos Street, Austin, Travis County, TX 78701 on behalf of Dr. Scholl's LLC, and informed said person of the contents therein, in compliance with state statutes.

**Description of Person Served:** Age: 45, Sex: F, Race/Skin Color: White, Height: 5'11", Weight: 175, Hair: Blonde, Glasses: N

My name is Mike Techow. My date of birth is 6/26/1972. My work address is 809 Nueces, Austin, TX 78701. I declare under penalty of perjury that the foregoing is true and correct. Executed in Travis County on July 14th, 2021 by Mike Techow, declarant.

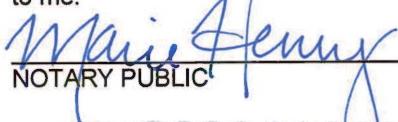


Mike Techow  
PSC-1215, Exp. 7/31/2022

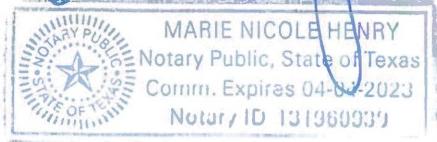
On Time Couriers/Process  
1700 Pacific Avenue  
Ste 1040  
Dallas, TX 75201  
(214) 740-9999

Our Job Serial Number: ONT-2021003458  
Ref: Alvaro Alvarado

Subscribed and Sworn to before me on the 14th day of July, 2021 by the affiant who is personally known to me.



NOTARY PUBLIC



**FORM NO. 3534 CITATION**

**THE STATE OF TEXAS**

**To:** DR. SCHOLL'S LLC  
BY SERVING THE SECRETARY OF STATE  
OFFICE OF THE SECRETARY OF STATE  
CITATIONS UNIT - P.O. BOX 12079  
AUSTIN, TX, 78711

**GREETINGS:**

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **160th District Court** at 600 Commerce Street, Dallas Texas, 75202.

Said **PLAINTIFF** being ALVARO ALVARADO AND MARIA LLANES

Filed in said Court on the **16th day of June, 2021** against

AVENTIS INC., BAYER CONSUMER CARE HOLDINGS LLC F/K/A BAYER CONSUMER CARE LLC F/K/A MSD CONSUMER CARE, INC., BAYER HEALTHCARE LLC, A SUBSIDIARY OF BAYER AG, BRENNTAG NORTH AMERICA, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO MINERAL PIGMENT SOLUTIONS, INC. AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), BRENNTAG SPECIALTIES, LLC F/K/A BRENNTAG SPECIALTIES, INC. F/K/A MINERAL PIGMENT SOLUTIONS, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), CLINIQUE LABORATORIES, INC., A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., CLINIQUE LABORATORIES, LLC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES INC., COLOR TECHNIQUES, INC., COSMETIC SPECIALTIES, INC. (SUED INDIVIDUALLY AND FORMERLY D/B/A G&G SPECIALTY PRODUCTS CO.), CROWN LABORATORIES, INC., DR. SCHOLL'S LLC, ESTEE LAUDER, INC, A SUBSIDIARY OF THE ESTEE LAUDER COMPANIES, INC., THE ESTEE LAUDER COMPANIES, INC. (SUED INDIVIDUALLY AND FOR LEN-RON MANUFACTURING CO. INC.), FIESTA MART, L.L.C., FISONS CORPORATION, GSK CONSUMER HEALTH, INC. F/K/A NOVARTIS CONSUMER HEALTH INC. F/K/A CIBA SELF-MEDICATION, INC. L'OREAL USA, INC., MAYBELLINE LLC, MERCK & CO., INC., NOVARTIS CORPORATION (SUED INDIVIDUALLY AND AS A SUCCESSOR-IN-INTEREST TO CIBA-GEIGY CORPORATION AND ITS SUBSIDIARIES CIBA CONSUMER PHARMACEUTICALS AND CIBA SELF-MEDICATION, INC.), PFIZER INC., PRESperse CORPORATION, PRESperse INTERNATIONAL CORP, PTI UNION, LLC A/K/A PHARMA TECH INDUSTRIES, REVOL CONSUMER PRODUCTS CORPORATION, SANOFI-AVENTIS U.S. LLC (SUED INDIVIDUALLY AND AS SUCCESSOR BY MERGER TO AVENTIS PHARMACEUTICALS INC.), SCHOLL'S WELLNESS COMPANY LLC, SPECIALTY MINERALS INC., (SUED INDIVIDUALLY AND AS A SUBSIDIARY OF MINERALS TECHNOLOGIES INC.), WHITTAKER CLARK & DANIELS, INC.

For suit, said suit being numbered **DC-21-07664** the nature of which demand is as follows: **Suit On OTHER (CIVIL) etc.**

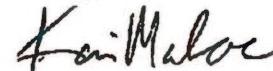
as shown on said petition a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

**WITNESS:** FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office **on this the 18th day of June, 2021**

ATTEST: FELICIA PITRE Clerk of the District Courts of Dallas, County, Texas

By

  
KARI MALONE

, Deputy



**ESERVE (SOS)**

**CITATION**

No.: **DC-21-07664**

**ALVARO ALVARADO, et al**

vs.

**AVENTIS INC., et al**

**ISSUED**

**ON THIS THE 18TH DAY  
OF JUNE, 2021**

FELICIA PITRE

Clerk District Courts,  
Dallas County, Texas

By **KARI MALONE**, Deputy

Attorney for : Plaintiff  
**JENNIFER MONTEMAYOR**

1201 Elm Street, Suite 3400

Dallas, Texas 75270

214-276-7680

**jmontemayor@sgptrial1.com**

**DALLAS COUNTY  
SERVICE FEES  
NOT PAID**

Cause No. DC-21-07664  
Court No: 160th District Court

Style: ALVARO ALVARADO, et al  
vs.  
AVENTIS INC., et al

**OFFICER'S RETURN  
FOR INDIVIDUALS**

**AFFIDAVIT  
ATTACHED**

Received this Citation the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock. Executed at \_\_\_\_\_, within the County of \_\_\_\_\_, State of \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock, by \_\_\_\_\_ delivering to the within named \_\_\_\_\_ each in person, a copy of this Citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

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**OFFICER'S RETURN  
FOR CORPORATIONS**

Received this Citation the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_M. Executed at \_\_\_\_\_, within the County of \_\_\_\_\_, State of \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock \_\_\_\_M. by summoning the within named Corporation, \_\_\_\_\_

President - Vice President - Registered Agent - in person, of the said

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a true copy of this citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

The distance actually traveled by me in serving such process was \_\_\_\_\_ miles and my fees are as follows: To certify which witness by my hand.

For Serving Citation \$ \_\_\_\_\_

Sheriff \_\_\_\_\_

For Mileage \$ \_\_\_\_\_

County of \_\_\_\_\_

For Notary \$ \_\_\_\_\_

State of \_\_\_\_\_

Total Fees \$ \_\_\_\_\_

By \_\_\_\_\_

(Must be verified if served outside the State of Texas)

State of \_\_\_\_\_

County of \_\_\_\_\_

Signed and sworn to me by the said \_\_\_\_\_ before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, to certify which witness my hand and seal of office.

Seal

State & County of \_\_\_\_\_